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ABSTRACT

This publication presents a lengthy study of the intermediate educational unit system in the state of Pennsylvania. Purpose of the study was to describe in a comprehensive manner the programmatic, operational, and fiscal aspects of intermediate units, to examine the significant interactions between intermediate units and other agencies (particularly the Pennsylvania State Department of Education and local school districts), and to recommend possible changes in the intermediate unit system. Data for the study were gathered mainly through a review of relevant state legislation, regulations, and court decisions, through personal interviews with numerous officials from the state department of education, and through lengthy questionnaire packages completed by individual intermediate units, school district superintendents, and school board presidents. (JG)

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REPORT ON THE PENNSYLVANIA INTERMEDIATE UNIT SYSTEM

May 1976

EA 008 861

FOREWORD

This is a report of a study of the "intermediate units", a system of twenty-nine public school organizations created by an Act of the Pennsylvania General Assembly. This study was undertaken by the staff of the Legislative Budget and Finance Committee pursuant to direction of the Committee at a meeting of November 26, 1974. Staff work actually began on the study project in April, 1975 and continued through April, 1976.

The report consists of six major sections as follows:

I. Program and Study Introduction
II. Legal Background of Intermediate Units
III. The Intermediate Unit Program in Operation
IV. Costs Associated with Intermediate Unit Program
V. Major Study Findings and/or Conclusions
VI. Report Recommendations

A response to this Report was developed by the Pennsylvania Department of Education and the Pennsylvania Association of Intermediate Units (Executive Directors). This response has been included in its entirety and is attached at the end of the Report (see page 193).

Primary staff work for this study was done by Mr. Ronald Smith, in conjunction with the staff Executive Director, Richard Dario.

Gratitude is extended to those persons who assisted the Committee staff during the course of this study, especially Dr. Robert G. Piatt of the Pennsylvania Department of Education, the individual intermediate unit executive directors and their staffs, the staff of the PDE Comptroller's Office, and numerous other PDE personnel. Appreciation is also extended to the many school district superintendents and school board presidents who assisted in this study by thoughtful completion and return of questionnaires. A special note of thanks is due to those intermediate units who cordially received our staff personnel in the personal visitation part of this study.

Any questions or other correspondence concerning the content of this report should be directed to Richard Dario, Executive Director of the Legislative Budget and Finance Committee, Senate P.O. Box 80, Main Capitol Building, Harrisburg, Pennsylvania 17120.

TABLE OF CONTENTS

Title Page
Foreword i
Table of Contents ii
List of Charts v

I. PROGRAM AND STUDY INTRODUCTION 1

- A. Overview of the Intermediate Unit System 1
- B. Purpose and Methodology of This Study 1

II. LEGAL BACKGROUND OF INTERMEDIATE UNITS 3

- A. State Laws Related to Intermediate Units 3
- B. State Board of Education Regulations Related to Intermediate Units 12
- C. State Department of Education Guidelines Related to Intermediate Units 18
- D. Judicial Issues and Decisions Affecting the Intermediate Units 21
  - 1. The Unconstitutionality of Acts 194 and 195 21
  - 2. The PARC Consent Agreement 22
- E. Apparent Legislative Intent for the Intermediate Unit System 23

III. THE INTERMEDIATE UNIT PROGRAM IN OPERATION 26

- A. Role of the Department of Education in the I.U. Program 26
  - 1. Special Assistant for Intermediate Units 28
  - 2. Special Assistant for Right to Education 30
  - 3. Special Assistant for the Executive Academy 31
  - 4. Bureau of Special and Compensatory Education 31
  - 5. Bureau of Planning and Evaluation 33
  - 6. Office of Corrections Education 35
  - 7. Bureau of Management Support Services 36
  - 8. Office for Nonpublic Schools 39
  - 9. Bureau of Curriculum Services 39
  - 10. Bureau of Instructional Support Services 42
  - 11. Bureau of Vocational Education 44
  - 12. Bureau of Information Systems 45
- B. Description of Intermediate Unit Operations and Programs 47
  - 1. General Information on Intermediate Units 47

2. Organizational and Office Structure of Intermediate Units 51
3. Programs and Activities of Intermediate Units 54

a. Special Education (Including Pupil Transportation) 57
b. Management Services 59
c. Nonpublic School Services 60
d. Instructional Materials Services 60
e. Curriculum Development and Instructional Improvement Services (Including Fine Arts and Mini Grants for Teachers) 61
f. State and Federal Agency Liaison 62
g. Continuing Professional Education 63
h. Educational Planning Services 64
i. Pre-School Education and Day Care Program 64
j. Vocational Education Services 66
k. Youth Detention Center Education 67
l. Adult Correction Institution, Adult Basic and Adult Secondary Education Programs 68
m. Pupil Personnel Services 69
n. Training Teacher Aides 69
o. Food Service Programs 70
p. MH/MR Institution Education 70
q. Summer Education or Recreation Programs 70
r. Remedial Education Programs 71
s. Post Secondary Education 72
t. Education of Children of Migrant Workers 72
u. Descriptions of Selected Individual I.U. Projects 73

4. Opinions of I.U. Executive Directors on Certain Issues 95

C. School District Commentary on the Intermediate Units 108

1. Report of Information Obtained from School District Superintendents 108
2. Report of Information Obtained from School District School Board Presidents 123
3. General Observations from Opinions of School District Officials Regarding I.U.s 136

IV. COSTS ASSOCIATED WITH INTERMEDIATE UNIT PROGRAM 138

A. Federal Funding of I.U.'s 140
B. State Funding of Intermediate Units 143

1. Special Education .143

2. Services to Nonpublic Schools 148
3. Intermediate Unit Subsidy 151
4. Pupil Transportation 154
5. Education at State Schools and Hospitals 157
6. Education at State Correctional Institutions 157

V. MAJOR STUDY FINDINGS AND/OR CONCLUSIONS 160

VI. REPORT RECOMMENDATIONS 165

APPENDIX A 166

SPECIAL ATTACHMENT - REPORT OF EXECUTIVE DIRECTORS AND THE PENNSYLVANIA DEPARTMENT OF EDUCATION CONCERNING REPORT ON THE PENNSYLVANIA INTERMEDIATE UNIT SYSTEM* 193

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*The PDE and the Pennsylvania Association of Intermediate Units (Executive Directors) have chosen to develop a combined response to this Report. That response is included in its entirety beginning on page 193.

LIST OF CHARTS

Chart Page

A. Department of Education Organizational Chart 27
B. Office of Basic Education Administrative Organization 29
C. Map of Intermediate Units 48
D. Physical Size and Number of Major Entities Served by Intermediate Units 49
E. Intermediate Unit Employee and Classroom Data for the 1974-75 School Year 50
F. Amalgamation of Intermediate Unit Organization Charts 52
G. Intermediate Unit Program Areas, FY 1974-75 55
H. Number of Program Areas in which Intermediate Units Offer Service, by I.U., FY 1974-75 56
I. Special Education Services Provided by All 29 Intermediate Units, FY 1974-75 58
J. Opinions of School District Superintendents on Importance of Certain Education Services of I.U.s 112
K. Summary of Financial Data for 26 of the 29 Intermediate Units 139
L. Federal Funds Granted to Intermediate Units Through PDE, FY 1974-75, by Federal Act 141
M. Federal Funds Granted to Intermediate Units Through PDE, FY 1974-75, by I.U. 141
N. State Payments to Intermediate Units During FY 1974-75 by Intermediate Unit and Per Student 144
O. State Payments to Intermediate Units During FY 1974-75, by Appropriation 145
P. Special Education Expenditures (Allocations) Per Intermediate Unit Per School Year 146
Q. Intermediate Unit and School District Expenditures-Allocations of State Support for Special Education Per Year Since the Inception of the Intermediate Unit 147
R. State Payments to Intermediate Units for Special Education Compared to Special Student Enrollment, FY 1974-75 149
S. 1974-75 Nonpublic School Services (Acts 194 & 195) Allocations to Intermediate Units 150
T. Nonpublic School Services (Act 89) Allotments, FY 1975-76 152
U. Intermediate Unit General Operations and Services Income by Source for the 1975-76 School Year 153
V. Comparison of State and Local Funding for General Operations and Services of Intermediate Units from 1971-72 Through 1975-76 School Years 155
W. State Payments to Intermediate Units for Pupil Transportation Compared to Special Education Enrollment FY 1974-75 156

X. State Payments or Allocations for I.U. Operated Education Programs at State Institutions for the Mentally Retarded, FY 1974-75 and 1975-76 158
Y. State and Federal Allocations to Intermediate Units for Education Programs at State Correctional Facilities, FY 1975-76 159

APPENDIX A 166

FY 1974-75 Revenue and Expenditure Data* 167-192*

* Includes charts for 26 individual intermediate units.

I. PROGRAM AND STUDY INTRODUCTION

A. Overview of the Intermediate Unit System

The INTERMEDIATE UNIT SYSTEM is the middle echelon of a tri-level public school system consisting of the Pennsylvania Department of Education, intermediate units, and individual school districts. There are 29 such intermediate units which collectively serve the entire Commonwealth of Pennsylvania and the 505 school districts contained therein.

Intermediate units were established by Act 102 of May 4, 1970. Companion legislation, Act 192 of January 14, 1970, had already dissolved the county school offices which were to be replaced by the intermediate unit system. Act 192 did not transfer to the intermediate units the regulatory and approval powers of the county school offices. Rather, the originating legislation organized the intermediate units as service agencies to school districts, and as an "intermediate" agency situated between the Pennsylvania Department of Education and the local school districts. In the first year of operation (1971-72 school year) the intermediate units were to provide essential services formerly provided by county boards of school directors and thereafter each intermediate unit board of directors was given the duty to adopt annually a program of services.

The intermediate units have been given duties in education of exceptional children and services to nonpublic school children, and have been authorized to deliver a host of other services which include curriculum services, instructional materials services, liaison with state and federal agencies, continuing professional education for public school educators, and many others.

B. Purpose and Methodology of this Study

The purpose of this study was to describe in a comprehensive manner the intermediate unit system including the programmatic, operational, and fiscal aspects of intermediate units, as well as the significant interactions of intermediate units with other agencies (especially the Pennsylvania Department of Education and school districts) and to report findings and conclusions of this study with appropriate recommendations.

In conducting this study the staff of this Committee did a thorough review of the law related to intermediate units, including review of legislative history in relation to the intermediate units (examination of pertinent legislative floor debates and legislative committee hearings). Additionally, certain "court decisions", the regulations of the State Board of Education and the regulations, standards, and rulings of the Pennsylvania Department of Education were reviewed for those aspects that pertain to intermediate units.

To ascertain the working relationship between the PDE and the I.U.'s, numerous individuals within the various offices and bureaus of the PDE were personally interviewed and on occasion asked to supply certain additional information. This personal interview procedure included especially the Special Assistant (to the Commissioner of Basic Education) for Intermediate Units, the Comptroller's Office, and the Bureau of Special and Compensatory Education; personnel from all other sections within the Office of Basic Education as well as some bureaus and offices that serve the entire PDE were also interviewed or contacted.

A "questionnaire package" was sent to all I.U.'s and personal visitations were made to several I.U.'s in order to gather specific information and data about the I.U.'s. The "questionnaire package" sent to the individual I.U.'s was comprehensive and lengthy. It consisted of four major parts - a General Information Questionnaire, a Package for Description of Activities, a Revenue Data form, and an Expenditure Data form. The personal visitations were made to the following seven I.U.'s: Allegheny, Northwest Tri-County, Capital Area, BLaST, Luzerne, Northeastern Educational, and Chester County. These visitations enabled our staff to personally observe virtually all operations of I.U.'s and to make personnel contact with and listen to the opinions and observations of a wide range of I.U. employees, and in particular the I.U. executive directors. Also, telephonic contact regarding a myriad of subjects was made with the executive directors and other key staff members of virtually every I.U. Further, one staff member attended six monthly meetings of the I.U. executive directors (The Pennsylvania Association of Intermediate Units), certain meetings of the State Board of Education, and the intermediate units' annual spring conference in March 1976.

In order to obtain opinions of school districts regarding the intermediate units, questionnaires were sent to school district superintendents and to school district school board presidents. A seven-page/seventeen-question questionnaire entitled "Questionnaire to Superintendents of Public School Districts Regarding Intermediate Unit Services" was sent to 178 superintendents, and a two-page/twelve-question "Questionnaire for School Board Presidents" was sent to 503 school board presidents. (Blank copies of the particular questionnaires sent to I.U. executive directors, school district superintendents and school board presidents are available upon request to Mr. Ronald Smith of our staff.)

The results of the study effort described above are set forth on the following pages of this report. It is the hope of this Committee that at the very least the report will provide the members of the General Assembly with additional understanding of the intermediate unit system as it currently exists in Pennsylvania.

II. LEGAL BACKGROUND OF INTERMEDIATE UNITS

There are a myriad of state laws, regulations and/or court related decisions that affect the intermediate unit system. This section of our report is intended to call attention to the major laws, regulations and decisions and to provide information on the major provisions of such. For ease of reference, the reader will find this section divided into the following major divisions: A. State Laws Related to Intermediate Units; B. State Board of Education Regulations Related to Intermediate Units; C. State Department of Education Guidelines Related to Intermediate Units; D. Judicial Issues and Decisions Affecting the Intermediate Units; and E. Apparent Legislative Intent for the Intermediate Unit System.

A. State Laws Related to Intermediate Units

1. Article IX-A of the Public School Code is the specific part of state law which provides the basic definition of the intermediate unit system; this Article was added to the Public School Code by Act 102 of 1970; it has been amended several times since then, most notably by Acts 308 of 1972, Act 57 of 1974 and Acts 89 and 90 of 1975. The following are some of the major provisions of Article IX-A in its current form.

a. "Intermediate units shall be a part of the public school system of this Commonwealth...."

b. "Each school district of the Commonwealth shall be assigned to an intermediate unit, and shall be entitled to the services of an intermediate unit, in accordance with a program of services adopted by the intermediate unit board of directors."

c. Section 902-A specifically sets forth 29 distinct intermediate units and names the particular school districts to be included within each of the individual I.U.'s. (Subsequent sections provide for transfer of a school district from one I.U. to another and for the merger of I.U.'s; such actions have not taken place to date, however.)

d. "The State Board of Education shall adopt such regulations as it deems necessary to guide the organization and operation of intermediate units...."

e. Annually "...each intermediate unit shall submit a program of services for the next school year to the Superintendent of Public Instruction [Secretary of Education] for budgetary approval. ...intermediate units shall receive subsidies from the Commonwealth...only for services...authorized by law...nothing contained herein shall prohibit [however] intermediate units from receiving funds from school districts and other sources including nonpublic nonprofit schools and expending such funds to provide additional services not included in the approved program of services."

f. "All powers and duties of county boards of school directors[1] with respect to special pupil services [and vocational-technical education] are hereby transferred to intermediate unit boards of directors... and all Commonwealth payments theretofore paid to county boards of school directors on account of special pupil services [and vocational-technical education] shall... [after July 1, 1971] be paid to intermediate unit boards of directors."

g. Intermediate unit boards of directors consist of 13 members who serve 3 year terms (an individual may serve a maximum of 3 terms on the board); I.U. board members are elected from among the public school directors of the school districts within the geographic area of the I.U.; elections are held each April at the I.U. Annual Convention of such school directors in order to fill vacant board slots; the election of I.U. board members is by proportionate ballot with directors from districts with larger pupil populations having a larger number of votes (per director) than directors from school districts with a lesser number of pupils. Officers of the I.U. board are elected by the I.U. board members annually in July; the President and Vice President must be I.U. board members but the Secretary and Treasurer need not be (e.g., the latter two may be paid employees of the I.U.). Major powers and duties of the I.U. board include:

(1) to appoint the I.U. executive director and assistant executive directors (upon the recommendation of the executive director) and to determine their salaries; also to "approve" other professional staff appointments made by the executive director and to "adopt employment policies" for nonprofessional staff;

(2) to adopt a program of services for the I.U., this program of services may include the following basic services: (a) "curriculum development and instructional improvement services", (b) "educational planning services", (c) "instructional materials services", (d) "continuing professional education services", (e) "pupil personnel services", (f) "State and Federal agency liaison services", and (g) "management services". Any services to be provided generally (as a part of the program of services) in addition to those listed above would have to be expressly approved by a majority of all the boards of school directors located within the I.U. area. (It is important to note, however, that Section 907-A of the School Code clearly states that I.U.'s may provide services not included in the "approved program of services" to school districts or other entities which provide the funds to finance those services.)

1/ County boards of school districts (and county superintendents of schools) were abolished by Act 192 of 1969 in anticipation of the creation of the intermediate unit system.

(3) "To adopt and advertise the intermediate unit budget."[2]
(4) To provide services "...authorized by the State Board of Education, including services performed under contract with component school districts"; to carry out functions "...in regard to classes and schools for exceptional children, educational broadcasting, audio-visual libraries, instructional materials centers, area technical schools and area vocational-technical schools..." all of which were previously assigned to county boards of school directors.
(5) "To lease land, buildings and equipment."[3]
(6) "To perform such other duties as may be required by regulation of the State Board of Education."
(7) "To prepare and submit to the State Board of Vocational Education proposals for arranging school districts of the intermediate unit into area vocational-technical attendance areas...."

h. The I.U. staff is to consist of an executive director[4] and "such assistant executive directors,[4] program specialists, and other personnel as the intermediate unit board of directors deems necessary...." All executive directors and assistant executive directors are required to hold a "commission" issued by the Secretary of Education; also all "program specialists" are to meet minimum qualifications adopted by the State Board of Education. All professional and temporary professional employees of an intermediate unit [largely classroom teachers] shall have the same rights of tenure, minimum salaries and increments...as professional employees of school districts.

i. The executive director of each I.U. is required to call a convention of all school directors within the area of the I.U. in April of each year for the purposes of electing members to the I.U. board of directors, approval of the I.U. budget, and "...discussion of matters pertaining to the improvement of education in the public schools within the intermediate unit...." Also among the stated functions of the I.U. executive directors is a requirement "To perform such other duties as may be required by the intermediate unit board of directors and the regulations of the State Board of Education."

2/ In addition to approval by the I.U. board, the budget process includes (1) approval by a majority of the school district school boards within the I.U., (2) approval by a majority of the school directors present and voting proportionately at the annual convention of school directors of school districts comprising the I.U. area, (3) approval by the Secretary of Education (the budget for each ensuing fiscal year must be submitted to PDE before May 1), and (4) advertisement to the public within each of the component school districts. This process is generally only applied, however, to expenses for activity within the approved program of services, it is generally not applied to special education, vocational education and federal programs and Act 89 nonpublic school services.
3/ All such leases (for office space, classrooms, buses, equipment, etc.) are subject to pre-approval, however, of the Secretary of Education (24 P.S. 59-969).
4/ Executive director and assistant executive directors are appointed for four year terms.

j. Sources of I.U. funding specifically provided for in Article IX-A of the Public School Code include the following:

(1) A "general operating subsidy" to be paid in two approximately equal installments, the first in July (to cover the first half of the fiscal year) and the second installment in December; the total amount of the subsidy paid to any single I.U. is based on three major factors: (a) the amount of the state appropriation for all I.U.'s statewide, (b) the portion of the statewide I.U. appropriation "allocated" by formula to that particular I.U.[5], and (c) the approved budget expenditures of the I.U. (See page 5 of this report for discussion of I.U. budget process.)

(2) A "capital subsidy" to assist I.U.'s in payment of all leased office space, classrooms, buses, garages, equipment and other items; the amount of the payment is determined by multiplying the I.U.'s aid ratio[6] times the lease costs.

(3) "School district payments" are due the I.U. when its approved budget amount exceeds the amount of monies available to it from the above two state subsidies. Generally all school districts[7] within the I.U. are required to contribute a share to cover costs above the state subsidy amounts for I.U. activities contained within the "approved program of services". The amount of the payment required of school districts to cover the "budget overage" differs among the districts and is

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5/ The amount of the allocation to a particular I.U. is determined via a complicated formula set forth in Section 917-A of the Public School Code. This formula takes into account the total number of pupils (WADM) contained in the school districts comprising the I.U. and the value of taxable real property within the I.U. as compared to real property values in other I.U.'s. There is, however, a "minimum guarantee" that no I.U. can receive less in state allocation than the aggregate state and county support provided during the 1968-69 school year to the offices of the county superintendents of schools replaced by that I.U.

6/ The aid ratio is a computed factor based on the value of the taxable real property per student in each I.U. as compared to other I.U.'s. For the 1975-76 school year the value of aid ratios varies among the I.U.'s from a high of 70.6% for Tuscarora I.U. to a low of 17.4% for Montgomery County I.U. This means, e.g., that the State could pay up to 70.6% of Tuscarora I.U.'s lease costs but only up to 17.4% of such costs for Montgomery County.

7/ A school district may be excused by the I.U. from participation in the cost of one or more of the I.U. services if the I.U. board of directors "...determines that the quality of such [district provided] service is adequate and that such independent action will not adversely affect the service to be offered to the remaining districts by the intermediate unit...." Also, a group of less than a majority of the school districts in an I.U. may contract with the I.U. for specific services to those districts, in which case the costs of such services are paid by the contracting districts in whatever manner they and the I.U. agree upon.

determined via a complicated weighting formula designed to require a larger cost per student from school districts which have a high value of taxable real property in comparison with other districts in the I.U.[8]

(4) State special education subsidy payments to include all such payments previously paid to county boards of school directors. These payments are described within other sections of the Public School Code; in general, they provide for state coverage of the entire "excess costs"[9] for education of exceptional students.[10]

(5) State payments to intermediate units for certain activities related to nonpublic school services; a description of the manner in which the amount of such payments is determined as well as a description of the major additions to Article IX-A by Acts 89 and 90 of 1975 are set forth immediately below.

(6) In addition to the specific subsidies set forth, Article IX-A specifically authorizes the I.U.'s to receive federal, state, school district and other moneys and to expend the same.

k. Upon the declaration by the U.S. Supreme Court that the major provisions of Sections 922-A and 923-A of the Public School Code were unconstitutional[11], the General Assembly approved Acts No. 89 and 90 of 1975 which added Section 922.1-A and amended Section 923-A. Major provisions of these two sections in current form are as follows:

(1) "Students attending nonpublic schools shall be furnished

8/ Representatives of certain intermediate units indicated to our staff a belief that this weighting formula results in unfair costs to certain school districts as a result of double application of equalization factors. Proposals currently being considered by the General Assembly for major revisions of the Public School Code include proposed changes to this current weighting system.

9/ Roughly defined, excess costs are determined by subtracting the estimated cost for providing an education to a "regular" student in any district from the total cost for educating a particular "special education" student in that district.

10/ "Exceptional children" are defined in the Public School Code as "... children of school age who deviate from the average in physical, mental, emotional, or social characteristics to such an extent that they require special educational facilities or services and shall include all children in detention homes."

11/ These two sections had been added to the School Code by Acts 194 and 195 of 1972; see further discussion regarding them beginning on page 21 of this report.

> a program of auxiliary services[12] which are provided to public school students in the school district in which their nonpublic school is located. The program of auxiliary services shall be provided by the intermediate unit in which the nonpublic school is located, in accordance with standards of the Secretary of Education. Such services shall be provided directly to the nonpublic school students by the intermediate unit except that such services shall not be provided in a church or in any facility under the control of a sectarian school. Such auxiliary services shall be provided directly by the intermediate units ..." The Secretary of Education is required to "allocate" annually to each I.U. an amount of state funds equal to $45 times the number of students enrolled in nonpublic schools within that I.U.'s geographic area as of October 1 of the preceding school year; this per student amount is to be increased proportionately with increases in the per student maximum reimbursable limit set forth in the basic instruction subsidy formula for public school districts. I.U.'s are permitted to use up to 6% of their allocation for administrative expenses and up to 18% for "rental of facilities"; also, the PDE is permitted to retain 1% of the aggregate of allocations for its administrative costs. (2) "The Secretary of Education directly, or through the intermediate units, shall have the power and duty to purchase textbooks and instructional materials and, upon individual request, to loan them to all children residing in the Commonwealth who are enrolled in grades kindergarten through twelve of a nonpublic school."[13]

l. Each intermediate unit is required to have an "Intermediate Unit Council" composed of all chief school administrators of school districts within the I.U.; it is to be chaired by the I.U. executive director and is required to meet at least five times per year; this council is intended to be "advisory" to the executive director.

m. I.U.'s are required to submit an "annual financial report" with an accompanying "auditor's report" to the Secretary of Education by October 1 of each year. Also, by January 1 of each year,[14] the Secretary of Education

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12/ "Auxiliary services" means guidance, counseling and testing services; psychological services; services for exceptional children; remedial services; speech and hearing services; services for the improvement of the educationally disadvantaged (such as, but not limited to, the teaching of English as a second language), and such other secular, neutral, nonideological services as are of benefit to all school children and are presently or hereafter provided for public school children of the Commonwealth.

13/ The intermediate units are not currently involved directly in this activity since the Department of Education has decided to operate the program itself and not "through the intermediate units".

14/ This requirement was added to the Public School Code by Act 57 of 1974; the requirement remains effective until 1980.

is required to develop and provide to the members of the General Assembly an annual evaluation report on the intermediate units, including such information for each I.U. as: services provided, number and types of employees, revenues by source, and expenses.

2. In addition to Article IX-A, the Public School Code also contains references to and/or requirements on the intermediate units within several other Articles; the following is a list of certain Articles within the Code and a description of the major items within these Articles which directly affect the I.U.'s.

a. Article III:

(1) Allows I.U. executive director to temporarily take full charge of the operations of a fourth class school district if a vacancy should occur in the entire membership of the school board;
(2) Prohibits I.U. executive directors and assistant executive directors from serving as school board members.

b. Article V:

(1) Requires I.U.'s to reimburse members of their boards of directors for expenses incurred for attendance of meetings and conventions.
(2) Authorizes I.U.'s to contract with the PDE, school districts, commercial and/or non-profit radio and television companies and others in order to participate in educational broadcasting efforts for children and/or adults.

c. Article X:

(1) Requires I.U. executive directors and assistant executive directors to swear to the same oath as set forth in the Public School Code for public school directors;
(2) Prohibits I.U. executive directors and assistant executive directors from serving as paid teachers (except for summer, evening or Saturday classes related to the training of teachers), from receiving "extra" compensation from any school districts in their areas, from benefiting monetarily in any way from the selling of books or supplies to districts in their area, and from the use of "bribery" of board members in order to influence their appointment to the position.

d. Article XIII:

(1) Requires every public school district to report annually every "exceptional child" within its district to its I.U., and each such child is to be examined by a psychologist; each district is also required to report to its I.U. regarding all such children enrolled in special classes;

(2) Required I.U.'s to develop "plans" for the education of "exceptional children" and submit them to PDE by August 1, 1970 for approval; such plans were to be "subject to revision from time to time"'

(3) Requires I.U.'s to operate classes for all exceptional children who are not enrolled in "special classes" operated by school districts[15,16]; and

(4) Requires I.U.'s to provide free transportation to and from special classes to all exceptional children whose appropriate school district does not provide such.

e. Article XVIII:

(1) Required all I.U.'s to poll the school districts within their area to determine whether or not they desired the establishment of one or more "area vocational technical schools" or "technical institutes"[17]; further, if the results of this poll indicated that sufficient districts in an attendance area desired the establishment of an AVTS or a technical institute, the I.U. board of directors was required to act as the agent to organize and establish such schools;

(2) Authorizes the school boards of all districts participating in an AVTS (acting jointly) to delegate responsibility for operating an AVTS to an I.U. board of directors; when such occurs, it would be consummated and defined via a written agreement between the I.U. board and the AVTS board; also, the law clearly reserves certain of the powers of the AVTS board from delegation to the I.U. board, including: ownership of land or buildings, adoption of budgets and employment of personnel.

f. Article XXIV requires that each school district send a copy of their annual financial audit report which is submitted to PDE to their I.U. and that the I.U. maintain a file of such reports.

15/ According to Opinion No. 137 of the Pennsylvania Attorney General (1972)-(as interpreted by Purdon's Statutes, Title 24) - "Primary responsibility for providing special education services rests with the local school district, and if school district is unable to provide special education services, intermediate unit must devise plan...."

16/ If the PDE judges that special education classes are not being provided in a suitable manner, the Department is authorized to operate such classes itself and to bill the school districts in which the pupils reside. (Section 1372 of the Public School Code).

17/ An "area vocational technical school" (AVTS) is defined in Section 1841 of the Public School Code as schools, departments or classes for pupils, out-of-school youth or adults within a specific attendance area approved by PDE to prepare such persons for vocational industrial, vocational agricultural, vocational homemaking, business and vocational distributive occupations, etc. A technical "institute" differs from an AVTS in that it is to offer post high school programs emphasizing "sub-professional" course offerings.

g. Article XXV of the Public School Code sets forth various state subsidy payments which are paid to public school organizations in Pennsylvania. The following are descriptions of the major individual subsidies available to I.U.s.[18]

(1) "...every intermediate unit shall be paid by the Commonwealth [annually]...the sum of thirty-five ($35) in vocational agriculture and vocational industrial education; twenty dollars ($20) in vocational home economics education; and fifty dollars ($50) in vocational distributive education per pupil... in vocational curriculums approved by the Secretary of Education"

(2) "...every intermediate unit authorized to operate an area vocational-technical school ... shall be paid [in equal installments in August and January] ... the amount of estimated cost for the operation [of the AVTS] ... including approved vocational extension[19] classes. Deductions to equal the above installments paid to ... the intermediate unit shall be made from reimbursements due the [school] districts of residence of pupils attending [the AVTS] ...." A similar provision is contained in the law to provide for payments to I. U.'s for operation of a technical institute. Also, provisions are contained in this article to provide for subsides to AVTS boards for the purchase of instructional and other equipment.

(3) "Annually [before July 1] ... every intermediate unit shall submit [to PDE for approval] ... an estimate of the cost of operating ... schools for exceptional and institutionalized children ... to be operated by the intermediate unit during the ensuing school year, and for transportation of pupils to and from [such classes]...." This section of the Public School Code requires the State to provide two approximately equal payments to each I. U. (in August and January) to cover the full approved costs of such schools and/or classes and related pupil transportation; the State recoups a portion of the amount of these payments to I. U.'s by withholding payments from each school district which approximate the costs that that district would have incurred if the exceptional children being educated by the I. U. were normal children being served in regular classes operated by the school district.

(4) Provision is made in this Article for subsidies to I. U.'s to cover the costs of summer classes or schools for children of migrant laborers; and "advance" payment is made by the State in July of each year for this purpose.

(5) All I. U.'s which operate an audio-visual library and instructional materials center are required to report on the

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[18] This does not include the basic I. U. operating and capital subsidies which are provided for in Article IX-A of the Public School Code and described on page 6 of this report.

[19] Vocational extension classes are those conducted for "...out-of-school youth or adults having an ... educational objective which has been provided for in the state plan for Vocational Education...."

cost of operating such to the PDE each July; further, the PDE is authorized to make "special grants" to such I. U. 's to assist in the costs of operating such A-V centers; such "special grants" are only to be made, however, when funds are specifically appropriated for such purposes.[20]

In addition to such subsidy provisions, Article XXV also, places various requirements upon I. U.'s and the PDE which are generally related to information to be used in calculation of subsidy amounts and transmission of such payments to I. U.'s.

B. State Board of Education Regulations Related to Intermediate Units

The State Board of Education is required within various sections of the Public School Code to develop and maintain regulations related to the intermediate units. Section 905-A of the Code states, e.g., that "The State Board of Education shall adopt such regulations as it deems necessary to guide the organization and operation of intermediate units...." Another example is Section 914-A of the Code which requires intermediate units "To perform such other duties as may be required by regulation of the State Board of Education."

Pursuant to the above cited sections of the Code (and others) the State Board has adopted regulations dealing specifically with the I. U. program[21] (chapter 17 of the regulations of the State Board of Education). In addition to a specific chapter of the regulations devoted directly to the I. U.'s, the State Board has also adopted many other regulations which have direct impact on I. U. operations.

This Section of the report is intended to provide basic information on the provisions of chapter 17 of the regulations as well as on other parts of the regulations particularly important to the I. U.'s.

1. The following are excerpts from and descriptions of the major provisions of chapter 17 of the State Board regulations (entitled "Intermediate Units").[22]

20/ No such state funds subsidy program for A-V centers has been implemented to date.

21/ The State Board first adopted regulations governing the I. U.'s on January 15, 1971; these original regulations have since been amended only once, that occuring in November of 1975.

22/ This list does not include provisions contained in the State Board regulations which are clearly repetitive of State laws governing the I. U. since such provisions were described previously in this report.

a. "Intermediate Units shall be operated in accordance with the Public School Code of 1949... the regulations of the Board and the standards and guidelines of the Secretary [of Education]."

b. Part 17.3 of the regulations contains detailed guidelines regarding the procedures to be used by I.U.'s for the election of their board members, describing, e.g., the nominating procedure, breaking of tie votes, etc.

c. "The chairman of each [annual I.U.] convention[23] shall, ten days after the convention, file with the Secretary a complete report on the Convention."

d. Parts 17.11 through 17.15 of chapter 17 contain detailed requirements regarding facility leasing procedures for I.U.'s. They require, e.g., all leases by I.U.'s to be filed with the PDE, "...on such forms and in such manner and at such time as may be required by the Secretary [of Education]." They also describe several "conditions of lease" and indicate that "Lease payments per square foot will be made according to regulations established by the Secretary."[24]

e. Part 17.17[25] requires each I.U. to submit an "annual report" in October of each year to the Secretary of Education describing "...each service offered to the school districts comprising the unit..." with the descriptions to include:

(1) a brief narrative which compares intended accomplishments with those outcomes actually accomplished;
(2) the number and type of persons employed full-time and part-time by each service;
(3) the total cost and per-pupil cost for capital outlay, equipment, overhead and salaries for each service; and
(4) the source of revenue supporting each service.[26]

2. The following are excerpts from and descriptions of the major provisions contained in various chapters of the State Board regulations, other

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23/ Convention of all school directors from districts within the I.U. which is required by law to be held each April (See page 5 of this report).
24/ To date, the Secretary of Education has not officially issued a regulation establishing specific "lease payments per square foot."
25/ This provision was not included in the State Board regulations until November 21, 1975.
26/ This requirement for an annual report and the specific information such report is to contain were apparently added to the State Board regulations in order to facilitate the Secretary of Education's compliance with the provisions of Section 924-A of the Public School Code; (See page 8 of this report.)

than Chapter 17, which directly impact on the intermediate units.[27]

a. Subchapter A of Chapter 9 of the State Board regulations sets forth various requirements concerning instructional materials services (IMS) of intermediate units. Some of the provisions are:

> (1) If an I. U. provides an IMS it must be in accordance with standards of the Secretary of Education,
> (2) Revenues used by the I. U. for operation of the IMS are to be obtained from school districts on a pro-rata[28] basis if a majority of the component districts of the I. U. are participants in the IMS; if less than a majority participate, the I. U.'s and participating districts may decide their own method of determining the service charge, and
> (3) The IMS budget shall be included in the operational budget of the I. U.

b. Chapter 13 of the State Board regulations is devoted to special education programs; because of the I. U.'s extensive involvement in special education, many of the provisions of Chapter 13 pertain to the I. U.'s; some of these are as follows:

> (1) "The Secretary [of Education]shall establish standards for the education or training of all exceptional persons[29] in the Commonwealth ...."
> (2) "Each intermediate unit shall prepare a comprehensive plan for the education of exceptional school aged persons which includes the district plans, the intermediate unit plan and combination of the two plans. This plan shall include all programs and services available including welfare agencies, approved private schools and other private school and other private agencies. The Secretary shall prescribe the format and content of the intermediate unit and school district plans."
> (3) "Intermediate units and school districts shall mainstream[30] those exceptional persons who can profit by an appropriate program of education or training in a regular class."

27/ This list does not include provisions contained in the State Board regulations which are clearly repetitive of State laws governing the I. U. since such provisions were described previously in this report.
28/ PDE has interpreted "pro rata" to be the "weighted" formula specified in section 920-A of the Public School Code which deals with school district payments for I. U. services; see page 6 of this report.
29/ Exceptional persons are defined as "Persons of school age who deviate from the average in physical, mental, emotional or social characteristics to such an extent that they require special educational programs, facilities or services and shall include all school aged persons in detention homes and statewide hospitals." (See footnote 10, page 7 for School Code definition.)
30/ Mainstreaming is defined as "An educational process of maintaining or returning exceptional persons who can best profit from such placement, to the regular education classrooms, with any needed supportive services being provided in accordance with the nature of the placement."

(4) "The primary responsibility for providing an appropriate program of education or training shall be that of a school district. Where such school district board cannot provide an appropriate program effectively and efficiently it shall use the services of the intermediate unit. The services of approved private schools, state schools and out-of-state institutions may be used, as hereinafter provided, where intermediate unit boards and school district boards agree that they cannot provide services effectively and efficiently for handicapped school-aged persons."

(5) "Intermediate units and school districts insure that handicapped school-aged persons are provided with an opportunity for placement in appropriate vocational education programs designed to meet their unique needs."

(6) "The following priority order of educational placement for handicapped school-aged persons shall be followed except where a deviation is needed to meet the appropriate needs of the person or the purpose of these regulations:

(1) A regular class in a regular school with supporting services.
(2) A school district special education program in a regular school; including homebound instruction.
(3) A school district special education program in a special facility.
(4) An intermediate unit program in a regular school.
(5) An intermediate unit program in a special facility.
(6) An approved private school program.
(7) A state school program.
(8) An approved out-of-state program.
(9) An intermediate unit program of instruction in the home."

(7) "If a handicapped school-aged person has been re-evaluated and is found to no longer have the exceptional characteristics that require special education programs and services, the intermediate unit or school district shall prepare an appropriate program for the person to return to the regular school. If at the end of one year, the individual demonstrates that the regular program is now appropriate all records and materials identifying the person as exceptional shall be placed in a confidential file and shall be released only upon permission of the parent or guardian."

(8) "The Secretary may approve placement of certain multihandicapped persons in out-of-state institutions with agreement from the parent, school district superintendent, and the intermediate unit executive director that there is no appropriate placement in the Commonwealth.

(9) "Special schools[31] devoted exclusively to the education of handicapped school-aged persons may be established by the intermediate units or school districts upon approval by the secretary."

31/ Special schools are "separate facilities" designated to meet the needs of handicapped school-aged persons; detailed requirements for such schools are set forth in Section 13.13 of the State Board regulations; "Approval for such schools shall only be granted after the school district or intermediate unit submits written documentation that there is no appropriate existing or projected regular or special classroom space available in the area."

(10) "Intermediate unit planning shall include provisions for use of approved private schools where appropriate to provide especially for multihandicapped school-aged persons."

(11) "Each exceptional school-aged person...[except trainable and profoundly mentally retarded persons] satisfactorily completing special education programs at the high school level shall be granted and issued a regular high school diploma by the district of residence[32].... Trainable and profoundly mentally retarded persons satisfactorily completing an approved special education program for the trainable shall be issued a certificate in accordance with standards established by the Secretary."[33]

(12) "Curricula for mentally or physically handicapped school-aged persons shall be conducted in accordance with standards established by the Secretary of Education ..."

(13) "Effective July 1, 1976, all gifted and talented school-aged persons identified shall be provided with an appropriate program of education or training including due process ... to determine the appropriateness of the classification and program. The primary responsibility for providing an appropriate program of education shall be that of the school district. If such district board cannot provide an appropriate program effectively and efficiently it shall use the services of the intermediate unit."

(14) "Curricula for gifted and talented school-aged persons shall be conducted in accordance with standards established by the Secretary ..."

(15) "School Districts may join in with other districts, intermediate units or the Department in a cooperative arrangement to provide programs for gifted and talented school-aged persons."

(16) "Section 13.31, 13.32 and 13.33 set forth various "due process" procedures. In essence these sections deal with the due process procedures applicable to all exceptional school-aged persons other than the mentally retarded (see (17) below). School

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32/ During the course of this study several I. U. personnel reported to our staff that some school districts were not willing to award diplomas or certificates to special education students and that in those cases the I. U.'s generally awarded the appropriate document. This recently adopted regulation appears to resolve this matter for exceptional children other than trainable and profoundly mentally retarded persons.

33/ These standards have not been issued as of the publication time of this report.

district initiated and parent initiated due process procedures are detailed in these sections. The major differences between these procedures and those for mentally retarded school-aged persons (see (17) below) are that in this case (a) provision is made for a school district parent conference prior to formal hearings and (b) provision is made for parents to raise the issue of educational status rather than having to wait for the school district, whereas these provisions are not part of the proceedings for mentally retarded persons.

(17) Section 13.61 of the State Board regulations stipulate that "No child of school age who is mentally retarded or who is thought by any school official, the intermediate unit, parents or guardian to be mentally retarded, shall be subjected to a change in educational status without first being accorded notice and the opportunity of a due process hearing."* The provisions of this section set forth the procedures to be followed before any change is made in the educational status of a mentally retarded child or a child thought to be mentally retarded.

(18) Section 13.62 of the State Board regulations sets forth the requirements of "Right to Education"** which resulted from the PARC vs. Commonwealth Court proceeding (see page 22 of this report).

c. Sections 49.181 through 49.184 of the State Board regulations set forth various standards and procedures for certain I. U. staff positions. The I. U. executive directors and assistant executive directors are to receive "letters of eligibility" from the PDE provided they meet the following qualifications:

(1) A doctorate degree or a master's degree plus 40 hours of graduate work, and
(2) Six years of educational work experience(the appropriateness of the work experience and academic preparation to be determined by the PDE).

The PDE is also to issue "permits" for individuals who are to be employed as

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*/ The due process hearings outlined here are as a result of the agreement and stipulation entered into by the Commonwealth as a result of the Court Order resulting from the Pennsylvania Association for Retarded Children vs. the Commonwealth of Pennsylvania proceeding, see page 22 of this report.

**/ In essence the "right to education" section limits the application of several state laws (provisions of the Public School Code which were enacted previous to the 1971 court suit brought by the Pennsylvania Association of Retarded Children) so that mentally retarded children of school age (between 6 and 21 years old) will be guaranteed the right to a free public education. Clause 5 of Section 13.62 states, e. g., that "... no school district or intermediate unit may deny access to a free program of public education to any mentally retarded child age six through 21 years whose parents elect to enroll that child in such a program."

"program specialists" by the I.U.s; the permit issuance will be at the request of the I.U. Board and based on job specifications proposed by the I.U. and approved by PDE.

C. State Department of Education Guidelines Related to Intermediate Units

The Secretary of Education is assigned by law and by regulation of the State Board of Education with several official functions involving regulation of or guidance to the intermediate units. Section 906-A of the "Public School Code" states, e.g., that each I.U. must submit annually its "program of services" to the Secretary of Education for "budgetary approval"; also, e.g., Section 17.1 of the Regulations of the State Board of Education indicates that I.U.'s shall be operated in accordance with "standards and guidelines of the Secretary [of Education]".

The PDE has developed a tri-level communications mechanism through which it transmits its official policies, rules, directions, and other information to public (and nonpublic) school organizations, including, of course, the intermediate units. Paragraphs 1, 2, and 3 below describe the specific items contained in this three-level system and give examples of their usage by PDE to regulate, guide, and/or inform the I.U.'s.

1. The Basic Education Handbook

This is a loose beaf book which contains rules, procedures, and information of long-term continuing value, including basic policies of both the State Board of Education and the PDE. Parts of this handbook are updated on an "as needed" basis (i.e., as changes are made by PDE). Examples of items included in the BEH are:

(1) Detailed instructions concerning the fiscal procedures to be used by I.U.'s to account for and report special education expenses,
(2) Procedures to be used by I.U.'s (and school districts) in providing special programs for children whose dominant language is not English,
(3) A legal ruling of the Department of Justice regarding the question of when the "contracted services" of an I.U. become part of its "program of services" and,
(4) The "consent agreement" for the "right to education" of mentally retarded children.

2. The Basic Education Memorandum (BEM)

These are issued periodically to local school organizations, including I.U.'s, by the Secretary of Education; they generally contain policies or directives of PDE which are of "major significance" and have "long term value". An example of this is "BEM Number 1" which was sent to school district superintendents, I.U. executive directors, and nonpublic school administrators on April 16, 1973, announcing and defining the three-tiered system for PDE communications which was being put into effect (i.e., the BEH, BEM's, and BEC's).

3. The Basic Education Circular (BEC)

These are issued periodically by the Commissioner of Basic Education (or Deputy Commissioner) to local school organizations for procedures, interpretations or informational materials that have significance to all or most school officials but are generally of short-term value. Examples of BEC's are:

(1) Announcements of "hearings" to be held by the State Board of Education and whom a person should contact to be scheduled for testimony,
(2) Information regarding the "school bus driver training program" to be offered by I.U.'s, including criteria for instructors, length of instruction, what is to be paid by PDE and PennDOT, etc.,
(3) Announcements by PDE of the "Right to Read" program to be offered by various I.U.'s, including names and telephone numbers of persons at the respective I.U.'s who should be contacted by school district representatives desiring to enroll in the program, and
(4) BEC No. 158 (issued by the Commissioner of Basic Education on November 22, 1974) which included the following quotes, "An appropriate program of education and training [for school aged mentally retarded persons residing in MR facilities operated and/or licensed by the Department of Public Welfare] shall be provided by the intermediate unit or as approved by the Department of Education... It is the intermediate unit's responsibility to make every effort to ensure that all physically and medically capable individuals receive their education by attending classes in the community...."

The communications system described above (as indicated) is applicable to all levels of local school organizations; there is no specific separation of the parts of the BEH or of BEC's and BEM's which relate particularly to I.U.'s. Various requirements of the PDE applicable to I.U.'s are contained in many of the currently effective BEC's, BEM's, and the BEH, but no attempt will be made to list all of them here due to the interrelationship of such requirements on I.U.'s with those on other school organizations within the same document, unclear statements of the extent of some of the requirements included in the documents, date and nature of some of the requirements, etc. There is no apparent central definition of precisely what requirements the PDE can or cannot exercise over I.U.'s through the BEH, BEM, or BEC method.

In addition to the BEH, BEM's and BEC's, the PDE also has certain regulations set forth in Title 22 of the "Pennsylvania Code"; these regulations generally do not impact directly on the I.U.'s. An exception, however, is chapter 181 of Title 22 which deals with mentally retarded children served in private schools; this chapter requires all private schools having such children enrolled to report them to the I.U. in which the school is located; it also requires each I.U. to then notify the parents of each such child reported of that child's right to a free public program of education.

Additionally, PDE has published Standards for the Operation of Special Education Programs and Services. These standards have great impact on intermediate unit operations in that they set forth requirements for special education activities which must be met by the intermediate units. The publication contains general standards that apply to all special education programs as well as specific standards that apply to each type of exceptionality. The standards deal with matters such as definitions of the various specific exceptionalities, admission and withdrawal from programs, and program management, including class sizes, curriculum, facilities, instructional materials and personnel. In regard to intermediate units some notable provisions of these standards are as follows:

(1) The range of class size (or instructional daily membership) is established for each exceptionality, e. g., for socially and emotionally disturbed exceptionality the class at the elementary level is 5-8 pupils and 8-12 pupils at the secondary level.

(2) "Special Education programs and services shall be developed and operated by the intermediate unit when the number of children properly identified in the school district is insufficient to support a specific program and when the intermediate unit has demonstrated available resources as defined in the standards for housing, equipping, and supervising the program and for transporting the children,as well as providing appropriate instruction."

(3) "To meet the needs of individual children, cooperative agreements shall be developed among adjacent intermediate units."

(4) "School district and intermediate unit plans shall provide for continuing informal program evaluation activities."

(5) "To meet the needs of individual children, approved private school placement shall be approved by district and intermediate unit professional staff whenever proper placement cannot be provided within the public schools.

(6) "Proposals for Special Education programs and services shall be submitted for program and budgetary approval to the Bureau of Special Education together with justification dates as required."

(7) The standards pertaining to trainable mentally retarded pupils includes a provision that requires intermediate units to "... insure that minimum enrollments are met whether the programs are district or I.U. operated."

(8) Instructional classes for children in detention homes "... shall be operated by the intermediate unit" and "a working agreement shall be developed between Intermediate Unit County Commissioners [apparently County Commissioners whose area is served by the individual I. U.] and Juvenile Courts of the County and/or its detention homes in determining a need for establishing classes within detention homes."

(9) Regarding detention home programs, the I. U. is required to submit an annual report specifying the total number of children taught, the number of hours of instruction, and a program description and evaluation. "The school district of residence is responsible for payment of the instruction program. Intermediate Units shall ensure annual reports ... are properly annotated to reflect these charges to the appropriate districts."

D. Judicial Issues and Decisions Affecting the Intermediate Units

There are two particular judicial issues that have had substantial impact on the activities of intermediate units. They are (1) the decision of the United States Supreme Court (rendered on May 19, 1975) that Act 194 and parts of Act 195 of 1972 were in violation of the U.S. Constitution and (2) the "consent agreement" approved by the Federal District Court for the Eastern District of Pennsylvania on May 5, 1972, to conclude a suit brought before the Court by the Pennsylvania Association of Retarded Children (PARC) against the Commonwealth of Pennsylvania. The following is intended to provide some background on these two judicial matters and their effect on I.U.'s.

1. The Unconstitutionality of Acts 194 and 195

The intermediate units had been charged by Act 194 (approved July 12, 1972) with providing a program of auxiliary services to students of nonpublic schools located within the I.U.'s service area. These auxiliary services were to include guidance, counseling, testing services, psychological services, services for exceptional children, remedial and therapeutic services, speech and hearing services, and services to the educationally disadvantaged. Act 195 (also approved July 12, 1972) gave the Secretary of Education the power and duty to purchase instructional material and equipment and loan such to nonpublic school children, either directly or through the I.U.'s.[34]

The I.U.'s assumed certain Act 194 and 195 duties during the 1972-73 school year and carried them on through school year 1974-75, ceasing, of course, upon the Supreme Court ruling of unconstitutionality. Actual activities of the I.U.'s in carrying out these duties included (a) hiring of personnel to deliver the auxiliary services[35] and (b) responsibility for the entire administrative procedure in purchasing instructional materials and equipment, including the maintenance of a current inventory of such items placed on loan to the respective nonpublic schools within the I.U. service area.

The I.U. carried out these functions for approximately three years as an integral part of their operations. According to a report issued by the PDE, the I.U.'s had a total of at least 962 fulltime and 1756 part-time employees working under the Acts 194 and 195 programs during the 1974-75 fiscal year.[36] An unknown portion of these persons continue to be employed by the I.U.'s during the current school year to carry out the requirements of Act 89 of 1975, an act which replaced Act 194 and also provides for I.U.'s to conduct auxiliary services for nonpublic school children.[37] The future disposition of the items which were purchased by the I.U.'s under Act 195 and are currently on loan to nonpublic schools is unclear at this time (a judicial panel is expected to rule on that matter).

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[34] PDE also was given the power to purchase textbooks and loan them to nonpublic school children directly or through the I.U.'s, but in the case of textbooks, the Secretary of Education exercised his option to administer the textbook loan program directly through the PDE rather than using I.U.'s.

[35] Many of the personnel so hired by I.U.'s were already employed by the nonpublic schools and were in effect hired part-time by the intermediate units.

[36] These employee figures were based on reports received from only 27 of the 29 intermediate units.

2. The PARC Consent Agreement

The Pennsylvania Association of Retarded Children[38] brought a suit against the Commonwealth of Pennsylvania in January of 1971 alleging the unconstitutionality of certain Pennsylvania statutes and practices under the Equal Protection Clause of the Fourteenth Amendment of the U.S. Constitution; in essence, the suit charged that mentally retarded children had historically been denied access to quality public education programs and demanded changes in the system. The suit was finally ended on May 5, 1972 when the United States District Court for the Eastern District of Pennsylvania gave final approval to a "consent agreement" arrived at between PARC and the Commonwealth of Pennsylvania. The "consent agreement" is quite lengthy; in essence, it stipulates that any child not admitted to a "regular" public school class due to mental retardation is entitled to placement in a free public education program suited to his particular needs. Included within the requirements of the agreement was provision for a "due process"[39] hearing related to the educational program to be offered to a mentally retarded child. This right of due process was extended by the State Board of Education, effective July

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37/ It is significant to note, however, that I.U.'s cannot employ persons for Act 89 services who are also current employees of sectarian schools; in addition, all I.U. employees providing professional services under Act 89 must have state "certification" for their position; also, they may not be "dressed" in sectarian clothes during delivery of the service; none of these requirements existed under Act 194.

38/ Now called the Pennsylvania Association of Retarded Citizens.

39/ "Due Process" as envisioned by the Court is a quasi-judicial proceeding that includes the requirement that parents of mentally retarded children receive timely notice of any proposed change in educational status of their child and that the child has the right to a full hearing presided over by an impartial officer; the parent has the right of access to records and to have counsel, to present evidence, and to cross-examine in the hearing proceeding. The burden of proof is on the school district, and an appeal mechanism is included to the Secretary of Education who can sustain or reverse the hearing officer's decision or remand the case for further information.

1975, to all handicapped children[40] (physically handicapped, visually or hearing impaired, etc.); further, this right will become effective for all exceptional children (including the gifted and talented) in September of 1976.

This consent agreement and the resulting due process regulations have had a major effect on the activities of the I.U.'s. I.U.'s have, e.g., become primarily responsible for locating handicapped children not enrolled in public school programs and organizing and operating classes for them; particularly added as a result of the consent agreement have been classes for the severly and profoundly retarded and in-home instruction[41] programs. In addition, I.U.'s have been assigned by PDE with the responsibility for operation of educational programs for all children who are residents of state owned institutions for the mentally retarded (see page 19 of this report). I.U.'s have also become involved, of course, in the actual due process hearings (which are technically between the school district and the parent), by acting in a consultative role to the school district or, at times, merely presenting information on the array of services and programs available to the child.

E. Apparent Legislative Intent for the Intermediate Unit System

The creation of the intermediate unit system in place of the county school offices (by Act 192 of 1969 and Act 102 of 1970) was a natural outgrowth of the reorganization of school districts which had taken place in the middle 1960's.[42] The existence of geographically larger, more heavily populated and generally more sophisticated school districts after reorganization made consideration of the need to replace county school offices a priority issue in the General Assembly.[43]

In order to ascertain the collective intention of the legislators who approved the I.U. legislation in 1970, particular research was conducted for the purposes of this report on floor debate in the General Assembly and on the

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40/ The due process proceedings for all handicapped other than the mentally retarded differ from the court approved proceedings for the mentally retarded in that (1) they permit the student to raise the issue of educational status rather than having to wait for the school district to do so, and (2) they require a school district parent conference before the scheduling of a formal hearing. This latter provision is expected to reduce the number of hearings that would otherwise take place. There is speculation at the present time that the due process proceedings for MR children will be amended to conform to the proceedings specified by the State Board for other handicaps.

41/ This refers to instruction provided by a qualified teacher in the home of a child who is physically or mentally unable to attend even a special education class.

42/ Under Acts of the General Assembly a major consolidation of local school districts in Pennsylvania had taken place in the 1960's reducing the total number of districts from over 2000 to approximately 500.

43/ In several counties (including Sullivan, Pike, Montour, Warren, Forest and others) the entire counties consisted of only 1, 2 or 3 school districts.

records of public hearings held in 1968 and 1969 by the House Education Committee. As a result of this research several major reasons for the enactment of the I.U. legislation became apparent; they are as follows:

(1) To extend equitable educational opportunity to exceptional children throughout the State - this is exemplified by the following statement by Representative Max Homer on the floor of the House on March 3, 1969: "By establishing the intermediate unit in Pennsylvania, you will be providing a much better service for the children who need this service the most, for children who are retarded, children who have emotional problems, exceptional children, I am talking about. These people would be given much better facilities by the smaller counties consolidating their services."

(2) To act as a stimulus to the development of vocational-education throughout the State - this is exemplified by the following quote from Representative Max Homer (in floor debate on December 2, 1969): "They [the smaller counties] cannot provide the necessary facilities for the vocational-technical training that is necessary. If Pennsylvania is indeed going to be a leader in the field of education, equal opportunity for all children should be had... ."

(3) To provide consultative, advisory and other specialized auxiliary services necessary to improve the educational system in a more efficient and economical manner - this is exemplified by the following quote from Representative Donald Fox (in floor debate March 4, 1969): "There is no need for the present county office administrative arrangement. It is inefficient in terms of the number of districts to be administered by the county office and the overlapping of responsibilities with those of some districts... The primary purpose [of the I.U.] is to provide services that the districts can do more effectively working together than individually... The intermediate unit will be a vehicle to share specialized personnel, services and equipment over wider geographic regions."

In addition to the expressed basic reasons for enactment of the I.U. legislation, there were also several important "expressions of intent" set forth by legislators during debate and by witnesses presenting testimony on the I.U. issue at legislative hearings. Some of these are as follows:

(1) "...the intermediate unit should not be a regional arm of the Department of Public Instruction. Rather, it should have its roots at the local level and should be controlled by the school districts that it was designed to serve." (Rep. Donald Fox, March 4, 1969);

(2) "I know from my numerous discussions with persons on all levels of education in Pennsylvania that the intent of this legislation [I.U. legislation] is to provide services through specialized personnel, and that the administrative personnel, the executive director and his assistants, will not require [a] large number of assistants." (Rep. Donald Fox, March 3, 1969);

(3) "...the purpose of the intermediate unit is to allow the smaller counties to join their facilities together in one common effort to provide better services, using the same amount of money that they are now spending individually..." (Rep. Max Homer, March 3, 1969);

(4) "The Intermediate Unit is that echelon of a three-echelon state education system (school district, intermediate unit, and state education department), which provides consultative, advisory, or educational program services to school districts. The responsibility for administration, supervision and program operation belongs to school districts...control of the Intermediate Unit is intended to lie with the school boards of the school districts comprising the Intermediate Unit area." (Dr. Paul Christman testifying on behalf of the State Board of Education at a hearing held by the Committee on Basic Education of the House of Representatives, January 30, 1968);

(5) "With increasing demands being made of the State Educational System, we believe there is a need for highly specialized services which cannot be provided adequately at the state level and which cannot be afforded by most of the local districts in Pennsylvania.

"The Intermediate Unit, if established in Pennsylvania, will provide leadership and service in each of the following areas of education.

1. Curriculum Development and Instructional Service.
2. Research and Planning Services.
3. Regional Instructional Media Services.
4. Continuing Professional Education Service.
5. Special Pupil and Pupil Personnel Services.
6. Administration and Management Services.
7. Local, County, Regional, State, and Federal Agency Liaison Services."

(Mr. Richard Strayer, Superintendent of Quakertown School District and President of the Bucks County Chief School Administrators Association, testifying before the House Committee on Basic Education, February 13, 1968).

III. THE INTERMEDIATE UNIT PROGRAM IN OPERATION

There are three levels of organizations deeply involved in current activities of the intermediate unit program: (1) the state government, (2) the intermediate units, and (3) local school districts. This section of the report provides background information on some of the activities at each of these three organizational levels that have substantial impact on the intermediate unit program. There is, of course, heavy emphasis on activity detail at the I. U. level itself and on a description of I. U. relationship issues at the state and school district levels.

The first portion of this section is devoted to the Department of Education (PDE)[1] and the particular activities carried on by its employees which are directly related to the intermediate units; nearly all of this information was obtained via personal interviews between the staff of our Committee and the staffs of the respective bureaus of the PDE. The second portion of this section (which begins on page 47) will be devoted to the intermediate units themselves; much of the information contained there was obtained from an extensive questionnaire which was completed partially or wholly by 28 of the 29 intermediate unit offices. Other information was obtained from personal interviews (either via telephone or in person) with the staffs of every intermediate unit. The third portion of this section (which begins on page 108) deals with I. U. related issues as viewed from the school district level; information included in this portion was obtained largely from two sets of questionnaires, one set to school board presidents and another set to school district superintendents.

A. Role of the Department of Education in the I. U. Program

The Department of Education is divided into two major functional areas, the Office of Higher Education and the Office of Basic Education; each of these areas is headed by a Commissioner and consists of several bureaus and/or offices. Chart A on page 27 provides a display of the organizational structure of the entire department.

As might be expected, nearly all contact between the PDE and I. U.'s takes place through the Office of Basic Education (OBE) and its various

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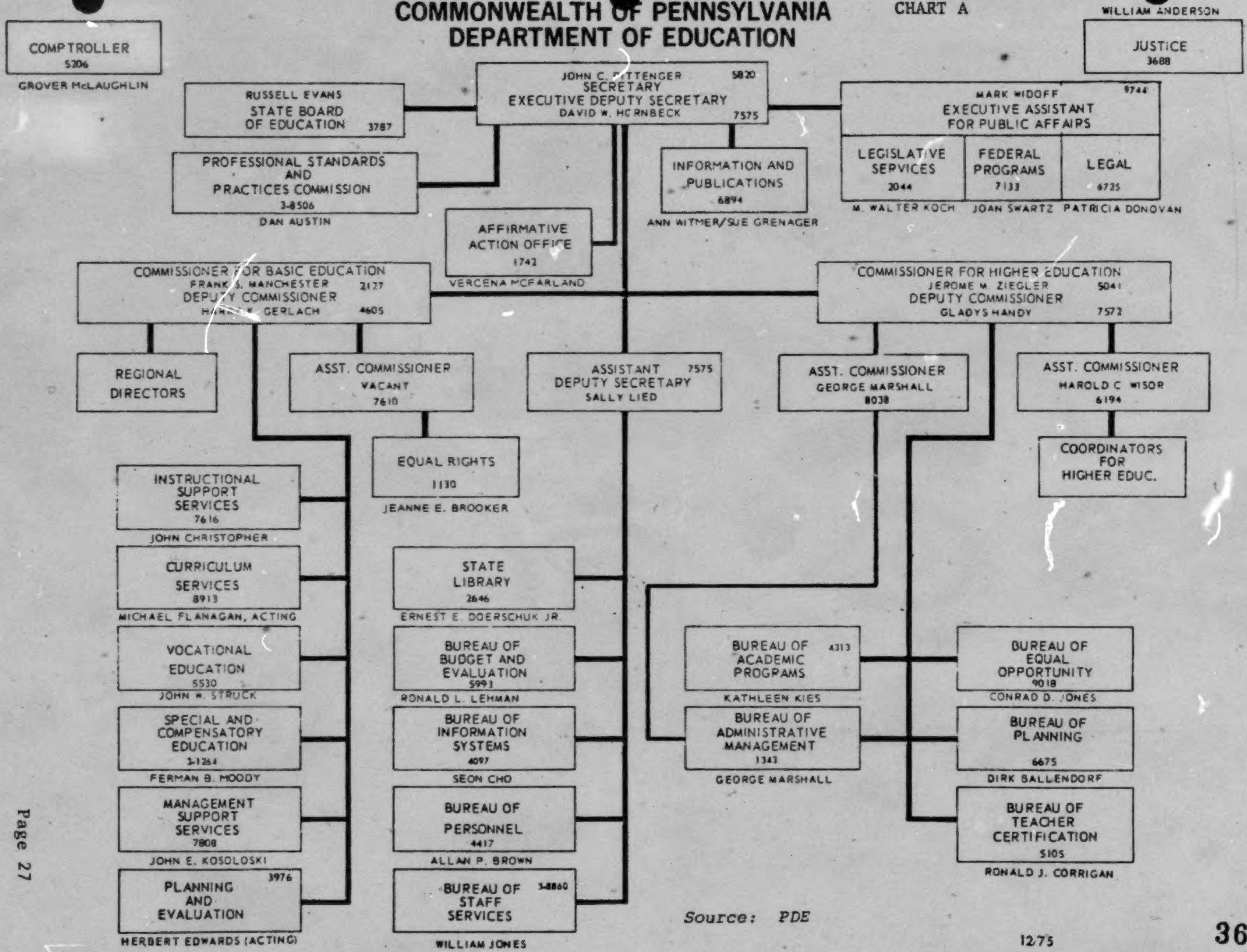
[1] It should be noted that at least three other state agencies in addition to PDE have ongoing contact with the I. U.'s, namely: the Auditor General, the Department of Public Welfare, and PennDOT. The Auditor General's staff conducts periodic on-site fiscal audits of all I. U.'s; and, PennDOT has a relatively small degree of contact with I.U.'s generally limited to the school bus driver training program (see page 19 of this report.)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION

CHART A


COMPTROLLER 5206
GROVER McLAUGHLIN
WILLIAM ANDERSON
JUSTICE 3688
JOHN C. PITTENGER 5820
SECRETARY
EXECUTIVE DEPUTY SECRETARY
DAVID W. HORNBECK 7575
RUSSELL EVANS
STATE BOARD OF EDUCATION 3787
PROFESSIONAL STANDARDS AND PRACTICES COMMISSION 3-8506
DAN AUSTIN
INFORMATION AND PUBLICATIONS 6894
ANN WITMER/SUE GRENAGER
MARK WIDOFF 9744
EXECUTIVE ASSISTANT FOR PUBLIC AFFAIRS
LEGISLATIVE SERVICES 2044
M. WALTER KOCH
FEDERAL PROGRAMS 7133
JOAN SWARTZ
LEGAL 6725
PATRICIA DONOVAN
AFFIRMATIVE ACTION OFFICE 1742
VERCENA MCFARLAND
COMMISSIONER FOR BASIC EDUCATION
FRANK S. MANCHESTER 2127
DEPUTY COMMISSIONER
GERLACH 4605
COMMISSIONER FOR HIGHER EDUCATION
JEROME M. ZIEGLER 5041
DEPUTY COMMISSIONER
GLADYS HANDY 7572
REGIONAL DIRECTORS
ASST. COMMISSIONER
VACANT 7610
ASSISTANT DEPUTY SECRETARY 7575
SALLY LIED
ASST. COMMISSIONER
GEORGE MARSHALL 8038
ASST. COMMISSIONER
HAROLD C WISOR 6194
EQUAL RIGHTS 1130
JEANNE E. BROOKER
COORDINATORS FOR HIGHER EDUC.
INSTRUCTIONAL SUPPORT SERVICES 7616
JOHN CHRISTOPHER
CURRICULUM SERVICES 8913
MICHAEL FLANAGAN, ACTING
VOCATIONAL EDUCATION 5530
JOHN W. STRUCK
SPECIAL AND COMPENSATORY EDUCATION 3-1264
FERMAN B. MOODY
MANAGEMENT SUPPORT SERVICES 7808
JOHN E. KOSOLOSKI
PLANNING AND EVALUATION 3976
HERBERT EDWARDS (ACTING)
STATE LIBRARY 2646
ERNEST E. DOERSCHUK JR.
BUREAU OF BUDGET AND EVALUATION 5993
RONALD L. LEHMAN
BUREAU OF INFORMATION SYSTEMS 4097
SEON CHO
BUREAU OF PERSONNEL 4417
ALLAN P. BROWN
BUREAU OF STAFF SERVICES 3-8860
WILLIAM JONES
BUREAU OF ACADEMIC PROGRAMS 4313
KATHLEEN KIES
BUREAU OF ADMINISTRATIVE MANAGEMENT 1343
GEORGE MARSHALL
BUREAU OF EQUAL OPPORTUNITY 9018
CONRAD D. JONES
BUREAU OF PLANNING 6675
DIRK BALLENDORF
BUREAU OF TEACHER CERTIFICATION 5105
RONALD J. CORRIGAN

Source: PDE

12/75

offices and bureaus.[2] Chart B on page 29 sets forth the organizational structure of the OBE. Please note from the organizational chart that there are several "special assistants" to the commissioner for Basic Education, including an assistant specifically for intermediate units.

This portion of the report provides background information on the manner in which the various offices, bureaus, and special assistants' offices of OBE interact with and impact upon the intermediate units.[3]

1. Special Assistant for Intermediate Units

This position was created in 1973 in order to serve as a coordinating and focal point of PDE contact with I.U.'s. Prior to that time, there was no single position in PDE primarily concerned with I.U. matters. This office is currently staffed by one professional (the Special Assistant himself) and one half-time clerical position.[4] The duties of this unit include the following:

(1) Coordination of PDE staff with I.U. staff in delivery of PDE programs and services to school districts;
(2) Liaison between PDE and the I.U.'s, including coordination of monthly meetings of the Pennsylvania Association of Intermediate Units[5] and visitations to I.U.'s by key

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2/ In addition to OBE, there is considerable contact between the PDE Comptroller's Office (It is important to note that while the Comptroller's Office is located for budget purposes within the PDE, it is under the supervision of the Secretary of Administration and not the Secretary of Education.) and the I.U.'s on subsidy and audit matters. The I.U.'s, e.g., obtain their various state subsidy payments through the Comptroller's Office; also, the annual audits which I.U.'s are required to have conducted of their expenditures by external auditors are submitted to and reviewed by the Comptroller's staff. These two activities result in a substantial amount of contact between the Comptroller's Office and I.U. personnel. There is also some contact between the PDE Office of Legislative Services and I.U. personnel in regard to state legislative activities.

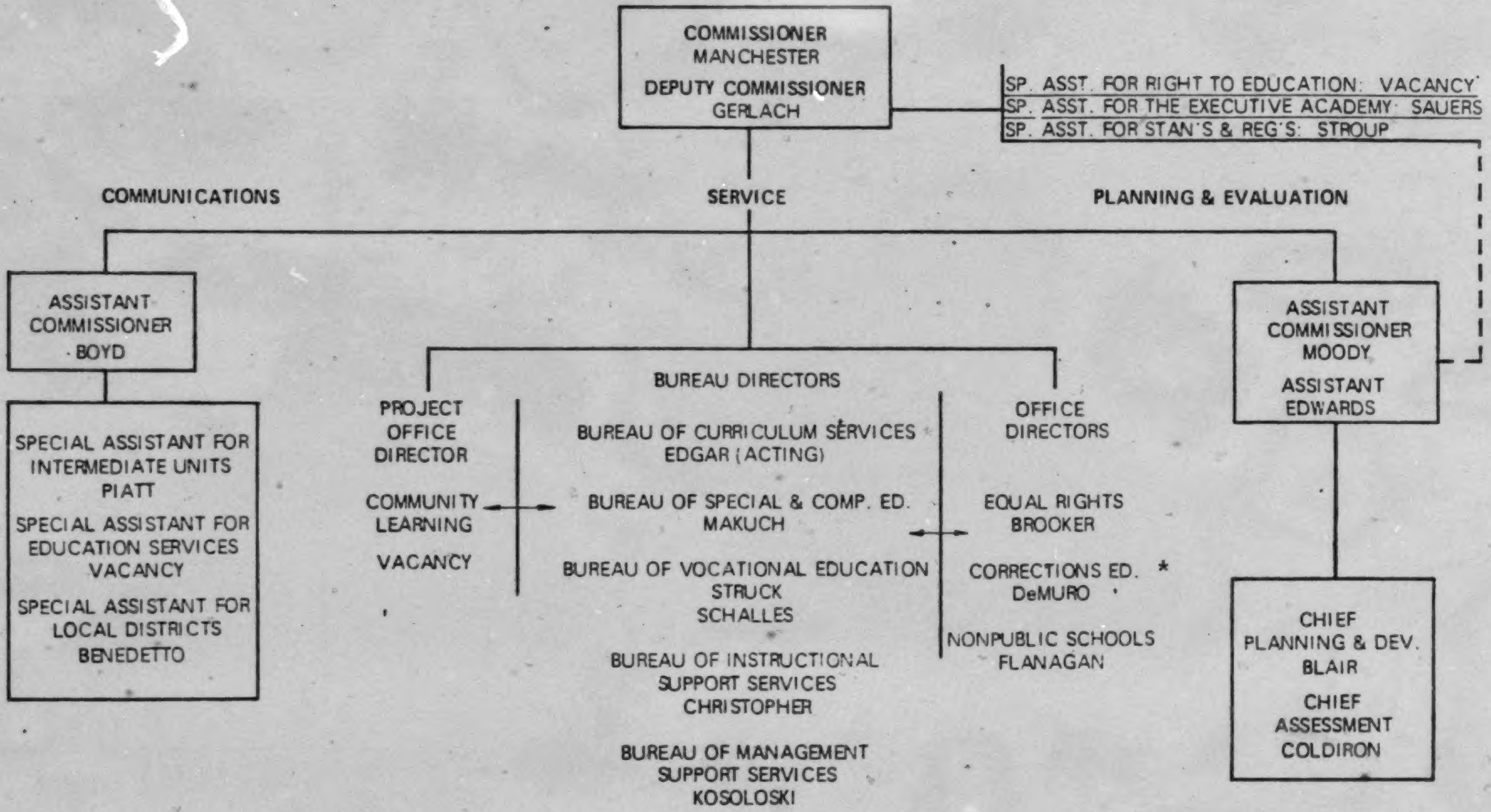
3/ No specific information is included for the bureaus and special assistants of OBE who have little contact with the I.U.'s.

4/ The special assistant position was vacant until the fall of 1974 when the present incumbent (Dr. Robert Piatt) was appointed to the position.

5/ This association consists of all I.U. executive directors (or their representatives); it is a "private" organization funded by the intermediate unit offices and is not funded by or a part of PDE. In addition to the monthly meetings of the Association which are held in Harrisburg in conjunction with PDE personnel, other major Association activities include: (a) an annual "Spring Convention" for I.U. staff personnel; (b) coordination of state legislative action on behalf of the I.U.'s through maintenance of a special "legislative action" subcommittee; (c) collection and publication of an annual statistical report on intermediate unit salaries, programs, and financial data, and (d) formation of various "ad hoc" subcommittees as needed to deal with specific issues important to all I.U.'s.

OFFICE OF BASIC EDUCATION ADMINISTRATIVE ORGANIZATION

CHART B


COMMISSIONER
MANCHESTER
DEPUTY COMMISSIONER
GERLACH
SP. ASST. FOR RIGHT TO EDUCATION: VACANCY
SP. ASST. FOR THE EXECUTIVE ACADEMY: SAUERS
SP. ASST. FOR STAN'S & REG'S: STROUP
COMMUNICATIONS
SERVICE
PLANNING & EVALUATION
ASSISTANT COMMISSIONER
BOYD
SPECIAL ASSISTANT FOR INTERMEDIATE UNITS
PIATT
SPECIAL ASSISTANT FOR EDUCATION SERVICES
VACANCY
SPECIAL ASSISTANT FOR LOCAL DISTRICTS
BENEDETTO
PROJECT OFFICE DIRECTOR
COMMUNITY LEARNING
VACANCY
BUREAU DIRECTORS
BUREAU OF CURRICULUM SERVICES
EDGAR (ACTING)
BUREAU OF SPECIAL & COMP. ED.
MAKUCH
BUREAU OF VOCATIONAL EDUCATION
STRUCK
SCHALLES
BUREAU OF INSTRUCTIONAL SUPPORT SERVICES
CHRISTOPHER
BUREAU OF MANAGEMENT SUPPORT SERVICES
KOSOLOSKI
OFFICE DIRECTORS
EQUAL RIGHTS
BROOKER
CORRECTIONS ED. *
DeMURO
NONPUBLIC SCHOOLS
FLANAGAN
ASSISTANT COMMISSIONER
MOODY
ASSISTANT
EDWARDS
CHIEF PLANNING & DEV.
BLAIR
CHIEF ASSESSMENT
COLDIRON

* Effective April 15, 1976, this Office officially became the "Office of Youth Services and Correction Education" (See description on page 35).

SOURCE: PDE

MARCH 1, 1976

PDE personnel;
(3) Coordination of all reports and data transmitted between PDE and the I.U.'s;
(4) Completion of the annual evaluation of I.U.'s required by Section 924-A of the Public School Code (see page 13 of this report);
(5) Representation of the I.U.'s at meetings of the State Board of Education; and
(6) Direct contact with I.U. boards of directors, advisory councils and staffs.

A key function assigned to this Special Assistant on December 12, 1974 (via memorandum from the Commissioner of Basic Education) was to discuss with other PDE personnel any plans they had that would "...involve I.U. personnel in [PDE desired] programs or activities...." When such plans are brought to the special assistant's attention he is to assess them for the purpose of ascertaining whether or not the program or activity being considered fits properly into the role of the intermediate unit. Prior to the time of the Commissioner's memo, there was no formal notice to PDE staff which would have required prior approval before involving I.U.'s in programs or activities instigated at the Department level.

2. Special Assistant for Right to Education

As a result of the "consent agreement" between the Commonwealth of Pennsylvania and the Pennsylvania Association of Retarded Citizens (PARC)[6], the PDE developed a statewide "Right to Education" effort and appointed a special assistant to the Commissioner of Basic Education to see to its implementation.[7] The Right to Education Program includes: a public awareness element designed to identify and locate mentally retarded children, a design and set-up of procedure phase which is intended to continue to identify and locate mentally retarded children, the establishment and operation of "due process" hearings which are quasi-judicial proceedings that provide parents of mentally retarded or thought to be mentally retarded school age children the opportunity to challenge the educational placement of their child as proposed by the school district.

6/ This consent agreement was approved by the Federal Court on May 5, 1972; further discussion of the consent agreement and the guaranteed availability of appropriate educational service for mentally retarded persons of school age is set forth on page 22 of this report.
7/ The incumbent of this special assistant position during the period June, 1974, through January, 1976, was physically located in an office in the State Education Building (in Harrisburg). His entire salary during this time, however, was paid by I.U. No. 16 (Central Susquehanna I.U.), and he was apparently technically an employee of that I.U. rather than an employee of PDE. As of the date of this report, this special assistant position is vacant.

All intermediate units are deeply involved in Right to Education activities because they are the primary agency for delivery of education services to exceptional children. The Bureau of Special and Compensatory Education is also deeply involved in the effort (see page 33 for discussion of this bureau's activities). One particular I.U., (Central Susquehanna I.U.) is especially involved in the Right to Education efforts of PDE; this I.U. was awarded a federal grant (amounting to about $350,000 in fiscal year 1974-75) to carry out various activities throughout the state in support of the Program. A description of this I.U.'s efforts in this area begins on page 84 of this report.

3. Special Assistant for the Executive Academy

This special assistant position was created to see to the implementation of the Executive Academy. This is a PDE service (begun in 1974) intended to help the staffs of local school districts deal with educational issues and problems through the organization of local workshops and seminars concerned with problem solving, management training, information dissemination, etc. The PDE has asked the I.U.'s to participate in the program by operating "mini-academies". To assist the I.U.'s in carrying out this function, the PDE is developing a "packaged" course for the use of I.U.'s to deliver such services to local school districts within their service area.

4. Bureau of Special and Compensatory Education

This Bureau, which is responsible for administering programs for handicapped and disadvantaged children statewide, consists of two separate divisions: the Division of Special Education (including the Right to Education Office) and the Division of Compensatory Programs. The staffs of both of these divisions have substantial day to day involvement in the intermediate unit program.

a. Division of Special Education (DSE) - This division has responsibility for the administration of nearly all direct pupil education provided by the intermediate units. During the 1974-75 school year, the I.U.'s employed about 5,900 special education teachers to serve nearly 150,000 exceptional pupils, (while the public school districts employed about 2,600 special education teachers to serve approximately 52,000 such pupils).

In addition to direct operation of the majority of special education classes, I.U.'s are also deeply involved in the special education programs offered by local school districts. In April of 1974, the Commissioner of Basic Education by written communication formally required that all school districts coordinate their plans for special education through their respective I.U. executive directors who "...shall be responsible for the planning and management of all state allocations to districts and intermediate units for special education programs." In carrying out this function, each I.U. is informed by DSE of the total amount available for special education efforts within the I.U.'s geographic boundaries and is asked to cooperatively plan with the school districts in its area an aggregate special education expenditure program. Presumably, this entails arriving at a mutual agreement as to which special education classes will be operated by the I.U. directly and which by the respective individual school districts. Technically, the I.U. executive director (generally through his director of special education) has the responsibility for finally deciding the special education program structure and expenditure allocations within his I.U.'s geographic area; where agreement cannot be reached between the I.U. office and school district, an appeal can be made to the DSE for advice and settlement.[8]

This procedure of allotting special education monies on an intermediate unit geographic area basis was initiated by DSE as a budgetary control measure. According to the Department, the new procedure has successfully allowed (required) decisions to be made on a local basis without exceeding the budget constraints as had been the case previously. The DSE believes that operating through I.U.'s in this manner is far superior to having their own personnel deal individually with the 321 school districts (in FY 1975-76) that operate at least one portion of their own special education programs.

This practice of school districts submitting their special education program plans through the intermediate units in order to obtain "mutual agreement" is the only instance where the intermediate units have a formal, official approval authority over school districts in a manner similar to powers previously held by county school offices. The Commissioner of Basic Education cited Section 1372(2) of the Public School Code as his authority in initiating the requirement; this section states: "Each intermediate unit, cooperatively with other intermediate units and with school districts shall prepare and submit to the Superintendent of Public Instruction...plans for the proper education and training of all exceptional children...."

In addition to state funds for special education flowing through the Division of Special Education to the I.U.'s, this Division also serves as a conduit for various federal grants which are available to I.U.'s for services to exceptional children.[9] For example, federal grants of over $5,000,000 are being provided through DSE to I.U.'s during FY 1975-76 to improve services at the I.U. level for handicapped children of pre-school age.

8/ Reportedly, the Division of Special Education has been asked to intervene with final settlement only two different times to date.

9/ Such federal monies are also available directly to school districts, but a staff member of the Division of Special Education indicated to our staff that the I.U. as the local operating agent for federal projects was preferred.

As indicated, the state Right to Education office is also located within the Division of Special Education; this office (in cooperation with the Special Assistant to the Commissioner of Basic Education for Right to Education) works closely with I.U.'s on a day-to-day basis. Particularly close involvement exists with I.U. #16 since employees of that intermediate unit are physically located within the same Harrisburg office as PDE employees who staff the state Right to Education office; these I.U. #16 employees have also apparently shared common functions and supervisory direction with the PDE employees.

b. Division of Compensatory Education - This Division has two primary responsibilities: administration of the federal grant program to local education agencies for services to educationally deprived children (ESEA Title I), and administration of state and federal grants to local education agencies for services to the children of migrant workers. The Division's work includes grant approval[10] in these two areas (serving as an agent of the federal government in some cases) and, of course, involves a great deal of day-to-day contact with the staffs of the local education agencies who are grant recipients. In most cases, the grants provided through this Division are awarded directly to individual school districts; but, in the case of five intermediate units,[11] a group of school districts within those I.U.'s have jointly asked the I.U. staff to serve as the grant recipient and administrative and fiscal agent for compensatory education activities within their particular districts. These five I.U.'s, then, as well as three additional I.U.'s that are grant recipients under the programs for the education of migrant workers' children, have substantial contact with the Division of Compensatory Education.

5. Bureau of Planning and Evaluation (BPE)[12]

This Bureau interacts with the I.U.'s in several areas of concern, including (1) long-range development plans of local school districts; (2) educational quality assessment; (3) student forum and advisory council; and (4) state-wide data collection. The following paragraphs set forth information on the specific interaction activities between BPE and I.U.'s in each of these areas of concern.

The BPE (through its Division of Field Surveys) is responsible for assisting local school districts in the composition of long-range development plans[13]; they consider the intermediate units to be the primary vehicle for delivery of this program to school districts. The Bureau conducts intensive workshop training sessions with the I.U. personnel who in turn are to deliver training in long-range planning procedures at the school district level.

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[10] A total of over $80 million was awarded in grants under these two program areas in FY 1974-75.

[11] These include I.U.'s #4, 5, 9, 14 and 19.

[12] According to an administrative reorganization which became effective on January 26, 1976, the Bureau of Planning and Evaluation is now under the direction of an Assistant Commissioner and Deputy Assistant Commissioner for Planning and Evaluation and presumably is no longer a Bureau per se.

[13] Since 1973, the emphasis by PDE in long range planning has been in curriculum development and community involvement.

The Educational Quality Assessment Division of the Bureau is charged with assessment of local educational programs in relation to the ten basic goals of education which were adopted by the State Board of Education several years ago. Intermediate units are heavily involved in this effort. Generally, I.U. personnel actively participate in introduction and explanation of the testing program at the local school district level, arrangement of testing schedules for districts within their I.U. service area, and arrangement of and active participation in workshops to help school district personnel understand the testing procedure and interpret the results.

The Student Forum-Advisory Board program was initiated by the Secretary of Education in FY 1972-73 as a means of obtaining student input to educational policy making. The Bureau of Planning and Evaluation is responsible for coordinating this effort at the state level. Under the program, each intermediate unit was asked by the Secretary of Education to form a Student Forum consisting of high school students from within the I.U.'s service area.[14] Each of these Intermediate Unit Student Forums then elects a representative to serve on the state level "Student Advisory Board" which addresses itself directly to the Secretary of Education.[15] Participation of the I.U.'s in the Student Forum Program is voluntary; all I.U.'s however, except Lincoln I.U. (#12), have participated in the program each year. Lincoln I.U. did not participate in school year 1974-75, and, as a result, high schools from that area of the Commonwealth were not represented on the Student Advisory Board; Lincoln I.U. is participating in the program during school year 1975-76.

The Bureau of Planning and Evaluation is sometimes called upon by PDE, or other state agencies, to gather statewide data pertaining to local school districts in a timely manner. For instance, during the heightened energy crisis of the winter of 1974-75, the Governor's Energy Council asked the Bureau to collect data on amounts and types of fuels used by schools. Another such instance was during a trucker's strike when the Bureau gathered data for the Office of Civil Devense as to supplies of food, fuel and other necessary items at schools throughout the Commonwealth. In these instances and other similar circumstances the Bureau has collected data through the intermediate units. This is accomplished, of course, through direct contact by Bureau personnel to I.U.'s and I.U. direct contact in turn to individual school districts within their service area.

14/ The Forums are to include representatives from each public, nonpublic and area vocational-technical school within the I.U.'s service area. They generally meet about six times per year and concern themselves with student related educational matters.

15/ In school year 1973-74, the Student Advisory Board adopted a Student Bill of Rights which was apparently the stimulus for adoption by the State Board of Education (in Sept. 1974) of the "Student Rights and Responsibilities" regulations. In the fall of 1975, 29 school districts collectively initiated a suit against the State Board of Education and the Secretary of Education alleging that these regulations amounted to state usurpation of local authority.

In like manner, intermediate units reportedly are often used by the Bureau to disseminate information that has a degree of immediacy. Items such as new policy, new regulations or timely need-to-know matters are frequently funneled through intermediate units, whereas less urgent material is generally disseminated through other channels such as Departmental publications.

6. Office of Youth Services and Correction Education [16]

Effective July 1, 1974, the PDE entered into agreements with the Departments of Public Welfare and Justice under which PDE assumed responsibility for the education programs at state owned youth detention centers and state prisons. The PDE, in turn, contracted with certain intermediate units for actual delivery of the educational services at the individual institutions.

During FY 1974-75, the PDE contracted with eight separate I.U.'s for delivery of educational services to eight state owned youth detention centers which were located within the respective geographic areas of each I.U.[17] A similar plan was carried out in FY 1974-75 for the eight state prisons, with each prison, except the one located at Camp Hill, being served by the I.U. within whose geographic area the prison is located. In the case of Camp Hill State Correctional Institution, the board of directors of the local I.U. (Capital Area Intermediate Unit) declined to accept the responsibility of the prison education program (citing the local control-of-program perogative), and PDE, therefore, contracted with an adjacent I.U. (Lincoln I.U.) to operate the education program at Camp Hill SCI.[18]

In FY 1975-76, the PDE maintained a contractual arrangement for delivery of education programs at the youth detention centers which was similar to their 1974-75 plan. It made a major change, however, in its arrangement for programs at the state prisons. In the case of prisons, the PDE adopted (partially) a "one intermediate unit concept". Under this arrangement, a single I.U. (Luzerne I.U.) was designated by the PDE to be the fiscal operating agent for education programs at six of the eight state prisons.[19] This change was made (according to a PDE official) because of program

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16/ In addition to educational service related duties described here, the Director of this Office on April 15, 1976, assumed (under contract) supervisory control of a portion of the employees of the Department of Public Welfare who are involved in non-educational types of services to delinquent youth.

17/ The Loysville YDC, in Perry County, received its educational services through a local school district (West Perry).

18/ Capital Area I.U. does deliver, however, "peripheral" educational service to certain inmates at Camp Hill SCI; the services are federally funded projects for specific education programs or purposes, such as the Adult Basic Education program.

19/ The remaining two prisons (Rockview and Graterford) continued to receive education services from local I.U.'s.

related disagreements[20] which apparently occurred during FY 1974-75 between PDE and certain of the I.U.'s and, also, because of a belief (expressed by PDE staff) that the one I.U. concept would bring about better fiscal and management control, cost savings, and better reporting procedures. The particular I.U. chosen for the task (Luzerne I.U.) was so chosen (according to PDE officials) because it enjoyed a good relationship with PDE and was willing to assume the responsibility.

Responsibility for coordination of this program at the PDE level rests with the Office of Youth Services and Correction Education. This Office is headed by a Director whose salary is paid by the Luzerne I.U.; the salaries of approximately one-half of the Office's ten Harrisburg based employees are also paid by the Luzerne I.U..[21] The Director of the Office of Youth Services and Correction Education is answerable to the Commissioner of Basic Education, officials of the Luzerne I.U., and the Deputy Secretary for Social Services of the Department of Public Welfare (See footnote 16 on page 35)..

7. Bureau of Management Support Services

This Bureau consists of four divisions, each of which has some degree of involvement with the intermediate units. The divisions include: School Administration, Food and Nutrition Services, Physical Plant and Construction, and Management Services. Some of the activities of the personnel in these divisions that relate directly to the I.U.'s are as follows:

(1) The Bureau determines the amounts due to each I.U. each year under the state subsidies for "general operating" and "capital" expenses;[22] this includes formula computation of allocation amounts as well as review of the individual I.U. budgets (which have already been approved at the local level-see page 5 of this report for a description of that process) for inappropriate requests. The Bureau may ask an I.U., e.g., to support or justify their intended use of certain monies.[23]

(2) The Bureau of Management Support Services has, at times, used the I.U.'s to deliver some of its programs and services to local school districts. In the summer of 1975, e.g., the Division of School Management conducted for I.U. personnel a

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[20] These "disagreements" apparently involve a belief by certain I.U.'s that they did not have sufficient fiscal control over or impact upon the prison education programs for which they were the operating agent.

[21] Reportedly, on May 4, 1976, paperwork had already been started to approve the position of Director as part of the PDE employee complement. If this effort should come to fruition, then the Director will be paid with state money rather than by Luzerne I.U..

[22] These subsidies are based on Sections 918-A and 919-A of the Public School Code (see page 6 of this report); they do not include support for activities in the areas of special education, federal projects, nonpublic school services, or other special projects. A full section of this report (beginning on page 138) is devoted to financing of the I.U.'s.

[23] According to a PDE official, although requests for justification have occurred several times, there has been only one instance to date in which an I.U. general operating budget item was specifically "turned down" for approval by PDE.

workshop in "child accounting" and pupil transportation with the expectation that the I.U. personnel would in turn carry this knowledge back to the administrative staffs of the local school districts in their respective service areas. In September of 1975, the Bureau conducted a series of inservice training workshops for I.U. business managers with a similar thought in mind. A slightly different arrangement was a series of 17 workshops concerning pupil transportation conducted by the Bureau during July and August of 1975 which were delivered directly by PDE personnel to local school district personnel. The Bureau relied on the I.U.'s in this case to make the local arrangements for the setup of their workshops, including sending out notices to school districts, securing a physical site for the workshop, registration, etc.

Another slightly different example is an instance in which the Food and Nutrition Services Division hired an individual to develop a "nutrition and education model" and in so doing specifically sought an I.U. (Allegheny I.U.) in which to house this person. The reported reasons for locating this person with an I.U. were to allow better contact with local school districts and to have the project identified with the public schools rather than PDE.

(3) The Bureau reportedly has on several occasions used the I.U.'s to disseminate to school districts information which was urgent in nature; the procedure used involves Bureau telephoning of the 29 I.U.'s and the I.U.'s in turn telephoning the school districts within their respective areas.

(4) The Division of School Administration has statewide responsibility for administration of state subsidies for school bus transportation, including approval authority of the transportation portion of the I.U.'s special education budget. This Division also has approval authority (in concert with the Division of Special Education) for I.U.'s to purchase vehicles that are specially equipped to serve severely

handicapped children.[24] (As of December 5, 1975, a total of 142 such special vehicles had been so approved for purchase by I.U.'s.)

(5) The Division of Physical Plant and Construction is responsible for reviewing all proposed construction projects of local school districts and determining whether or not they are justified. The Division has relied heavily on all 29 I.U.'s to carry out this activity; the review process had been a function of the county school offices before creation of the I.U.'s but was specifically deleted from the list of county office functions transferred by law to the I.U.'s. PDE staff reports that the I.U.'s are still used to assist in this activity because the PDE does not have a sufficiently large staff to carry out the school building construction approval process on its own.

There were reportedly about 160 building project inspections carried out by the various I.U.'s during FY 1974-75. Each inspection is done by a team made up by the I.U. and generally consists of at least one or two I.U. staff members along with local district representatives; this team sends its report to PDE indicating that the project is either justified,

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24/ The Public School Code does not explicitly provide for ownership of vehicles used by I.U.'s; whether or not they are, in fact, permitted to own vehicles has been a point of disagreement. A letter of April 8, 1971 from Pennsylvania Attorney General J. Shane Creamer to the Secretary of Education states "... an intermediate unit board of directors has no power to purchase school buses except for... one, very limited, purpose...." This "purpose" was described by Attorney General Creamer as "... transportation equipment... for those children so physically incapacitated or mentally retarded as to be unable to use... the usual school bus." An opposing point of view was delivered in a letter of December 9, 1974 from the Solicitor of the Allegheny Intermediate Unit to the Executive Director of same regarding the "Authority of the Intermediate Unit to purchase and hold title to motor vehicles". The concluding paragraph of that letter reads as follows: "While Mr. Creamer's opinion contains dicta that Section 914-A of Act No. 102 of 1970 grants to intermediate units no power to purchase a hold title to personal property... the ultimate result of such dicta would be an absurdity. Under this theory, the intermediate unit could not, for example, purchase or own a desk, a chair or a ream of mimeograph paper. The Statutory Construction Act of 1972 (1 Pa. S. Sec. 1922 (2)) teaches that it is presumed that the Legislature does not intend a result that is absurd, impossible of execution or unreasonable."

not justified, or requires further study.[25]

8. The Office for Nonpublic Schools (ONS)

This Office has responsibility for statewide administration of Acts 89 and 90[26] which were approved in August, 1975.[27] In carrying out this duty, ONS has substantial contact with I.U.'s since Act 89 charges each I.U. with the duty to deliver a program of "auxiliary services" to students of non-public schools located within the geographic area of that I.U. In providing this service, each I.U. most adhere to regulations developed by the PDE (through ONS); also, I.U.'s must deal with ONS to obtain their respective funding allocations for carrying out their Act 89 activities. Information on financial allocations to each I.U. for this program begins on page 148 of this report.

9. The Bureau of Curriculum Services

This Bureau functions as a consultative agency to local school districts on matters related to educational curriculum. The activities of its personnel include much direct contact, both on-site and remote, with school district personnel. This curriculum service function would appear to be similar in many cases to the curriculum services offered within the program structure of most intermediate units.

In carrying out its functions, the Bureau initiates and becomes involved in various workshops and/or projects on curriculum matters and in many of these interacts with one or more of the I.U.s. The Bureau's staff reports, e.g., that it often uses the I.U.'s as "host-facilitators" for regional workshops or meetings which are held by Bureau personnel for the staffs of more than one school district. Some of the specific curriculum related "projects" or activities conducted by the Bureau of Curriculum Services even more deeply involve the I.U.'s; the following paragraphs provide background information on examples of such "projects" or activities.

a. The Bureau operates a "Right-to-Read" program which is intended to eliminate illiteracy in Pennsylvania.[28] I.U.'s have played a key role

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25/ Some I.U. executive directors have voiced objection to participating in this survey process since the I.U. is placed in a position of approval of a school district request, a position which some executive directors feel to be out of character with the advice and service thrust of the I.U. program.

26/ Intermediate Units are not involved in implementation of the Act 90 program since these services to nonpublic schools are provided directly by PDE to local nonpublic schools.

27/ These two acts replaced Acts 194 and 195 of 1972 which were declared unconstitutional in May of 1975. The Office for Nonpublic Schools had, of course, been responsible for administration of Acts 194 and 195 as well; see page 21 of this report for discussion of the effect on I.U.'s of the discontinuance of the Acts 194 and 195 programs.

28/ The program goal is to reach a 98% literacy level for children and 95% literacy level for adults by 1980.

throughout this project; the project began in FY 1972-73 when federal grants for this purpose were awarded to twelve I.U.'s to assess needs in their areas and establish "model" Right-to-Read programs. These programs have continued through the current year.

In addition to this activity at the I.U. level, the program has involved the offering of six-week training courses by PDE personnel to educate school district teachers in Right-to-Read skills. Emphasis for these training programs has changed somewhat in FY 1975-76; specifically, PDE is now encouraging I.U.'s to have their personnel trained as Right-to-Read specialists with the expectation that these I.U. staff persons will in turn train school district personnel in program skills; it was reported that representatives of at least eleven I.U.'s would be involved in this training process during the current fiscal year.

One particular I.U. (Capital Area I.U.) has played a special role in the Right-to-Read program, having served since FY 1974-75 as the "fiscal agent" of the PDE for the teacher training part of the program. In this role, Capital Area I.U. receives a special grant from PDE which is used to pay all expenses incurred in conducting teacher training sessions for the program, including payments for training facilities, travel and lodging for program participants, and school district reimbursements for lost teacher time (regardless of the particular I.U. or school district which the teacher being trained represents).[29] Capital Area I.U. does not, however, have any part in the content, scheduling or other "program" decisions of the teacher training program; the authority for such decisions is retained by PDE.

b. The Bureau of Curriculum Services carries continuing responsibility for overseeing "in-service training" for professional employees of the public schools.[30] In carrying out this function, the Bureau has established fifty-six

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29/ This (fiscal agent) arrangement was reportedly sought by PDE to circumvent the bureaucratic processes for providing state government reimbursement to trained teachers and their respective school districts; reportedly, reimbursements can be processed by the Capital Area I.U. in a much shorter time than the "up to 3 months" sometimes required for reimbursement through normal PDE procedures. Capital Area I.U. receives an administrative fee of 5% (minimum of $2500) of all funds handled annually for providing this service.

30/ In-service training is formal, job-related course offerings for educators, particularly such courses that result in the award of "credits" toward teacher certification and the masters degree equivalency for pay purposes; each teacher in the Commonwealth's public schools must earn at least 24 "post graduate credits" (either through in-service courses or college courses) in order to be permanently certified by PDE as a teacher.

"in-service councils"[31] throughout the Commonwealth; twenty eight of these are operated by intermediate units,[32] with the remaining 28 operated by local school districts. In general, the I.U. in-service councils are more active than the councils operated by individual school districts. For instance, according to PDE documents, I.U.'s operated 83% of all in-service programs in the Commonwealth during a recent sixteen month period.

c. The Bureau of Curriculum Services, in conjunction with the Bicentennial Commission of Pennsylvania, initiated in FY 1973-74 a three year special high school debate program to culminate in the selection of two high schools to represent Pennsylvania in the National Bicentennial Debates. To accomplish this, the PDE asked each intermediate unit to conduct a local debate contest and select a championship team to participate in statewide debate competition. Intermediate unit participation in this program was optional; approximately three-quarters of the intermediate units have participated. The PDE did not report alternate plans to conduct the debates in school districts located within non-participating intermediate units.

d. In the Fine Arts section of the Bureau of Curriculum Services, there are three programs currently operated in conjunction with the intermediate units. They are: Special Education and the Arts, the Arts in Education Project, and the Governor's School for the Arts.

The Special Education and the Arts program concerns program development relating the Arts to learning experiences of handicapped children. This project was conceived by PDE personnel; they then sought an I.U. to conduct the program on a pilot basis. Capital Area Intermediate Unit (CAIU) conducted a preliminary phase of this project during 1974-75 school year (using $11,000 of federal funds). However, the CAIU Board of Directors chose not to continue this program on the basis that the concept was not thoroughly developed. The Department therefore sought another I.U. to continue the project. The Lancaster-Lebanon I.U. accepted responsibility for operating the project during the 1975-76 school year. The Project Director, who is an employee of Lancaster-Lebanon I.U., reportedly maintains close communication with PDE personnel. The project presently serves Harrisburg School District students (within the CAIU boundary) as well as students within the area of the Lancaster-Lebanon I.U.

The Arts in Education Project is another project conceived and initiated by the PDE but operated by an I.U. In this case, Berks County Intermediate Unit, encouraged and assisted by PDE personnel, wrote a proposal to

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31/ These councils consist of locally appointed representatives from groups including teachers, school administrators, school board members, college faculties, students and others. According to "Guidelines" published by the PDE, "It is the duty of each council to assess needs to design and solicit course proposals and to forward approved proposals to the Pennsylvania Department of Education for [determination of the amount] in-service credit [to be awarded for each particular course]. In addition, the council is responsible for evaluating courses."

32/ All I.U.'s except Pittsburgh-Mt. Oliver I.U. operate an in-service council.

obtain federal funding ($80,000) for this project, which is presently in a pilot stage and involves twelve school districts located in various parts of the Commonwealth. The project is intended to train teachers throughout the Commonwealth to incorporate fine arts into their every day teaching to ultimately develop in students an increased appreciation of the fine arts. The project director is technically a Berks County I.U. employee, but she was reportedly selected for the job by PDE personnel and reportedly continues to be supervised in part by PDE personnel.

The Governor's School for the Arts is a PDE project operated statewide through the intermediate units. Its purpose is to provide a program of intensified training and stimulation in the arts to talented students through the provision of a special 6 week summer course for such students. The program was started in the mid 1960's by PDE personnel and has evolved through several changes in funding, organization and location. The program is presently headquartered at Bucknell University in Lewisburg; the project director is an employee of Central Susquehanna Intermediate Unit which is officially the current operating agent for the project. PDE personnel are deeply involved, however; they, e.g., originally selected the person to serve as project director, take an active part in final selection of students who are to attend the school, and provide other supervisory and advisory guidance to the project director. All 29 intermediate units participate to some degree in the Governor's School for the Arts by advertising the project, soliciting student applications, selecting candidates and forwarding applications to the state level for final selection. Also, the federal monies that finance the program are awarded by PDE to the individual I.U.'s who in turn award $1,000 grants to the selected student candidates.[33]

10. The Bureau of Instructional Support Services

This Bureau consists of three divisions, all of which have substantial involvement with the I.U.'s. The particular divisions and I.U. interaction with each follows:

a. The Division of Educational Media (DEM) had historically operated a film library for the use of local school district personnel; this service was discontinued in 1973 by DEM because of the advent of film libraries being operated by the intermediate units as an integral part of the I.U. instructional materials service (IMS) centers. DEM reported a belief that IMS services are better operated at the I.U. level than by PDE in Harrisburg because of the closer proximity to the user school districts.

DEM reported a policy of generally referring media service requests from school districts to the appropriate I.U. The Division has also report-

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33/ During the summer of 1975, federal grants totaling $257,000 were awarded through the I.U.'s to 257 individual students as scholarships to attend the Governor's School for the Arts. Central Susquehanna I.U. also received an additional federal grant through PDE to assist (along with the $1,000 per student tuition fees) in meeting operating costs for the school.

edly attempted to coordinate certain highly technical media services amongst the I.U.'s; encouraging, for example, the provision of specialized electronic repair services at strategically located I.U.'s. DEM also coordinates materials among the I.U. IMS centers; e.g., the Division maintains a master inventory of the materials in the IMS centers of all I.U.'s and makes this information available to requesting intermediate units via computer printout. In addition, the Division allows each I.U. to include in its IMS materials and services catalog the services available directly from the Division (such as duplication of audio and video tapes, a service which DEM currently provides directly to school districts but plans to provide through I.U.'s in the future).[34]

Financial support for the intermediate unit IMS centers has flowed through the DEM; specifically one to one matching grants available under Title III of the National Defense Education Act have been provided. These grants, which were as high as $313,000 in FY 1973-74 but amounted to only $121,000 in FY 1975-76, will no longer be available to I.U.'s after June 30, 1976, reportedly due to changes in federal funding requirements.

b. The Division of Pupil Personnel Services has responsibilities in the areas of student guidance, counseling, health, psychological and social work services; these are all areas in which many I.U.'s offer services. This Division reports that it generally refers school district requests for psychological and vocational guidance services to the appropriate I.U.s', but the Division generally deals directly with inquiring school districts on school health, social work and regular guidance and counseling matters.

The Division has received assistance from intermediate units in coordinating workshops on such matters as student rights. In this instance, the Division turned to the intermediate units for assistance primarily to facilitate the program through group meetings; however, a secondary purpose of involving intermediate units in the facilitator role was to stimulate them to continue to carry on this type of activity at the local level.

c. The Division of School Library Services is responsible (among other functions) for statewide administration of the federal ESEA Title II program. Under this program federal monies are available (about $5 million per year statewide) for purchase of library materials for both public and nonpublic schools. Beginning in FY 1974-75, the Division enlisted the aid of the I.U.'s to administer the portion of the Title II grant program dealing

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34/ The Division of Educational Media hopes that by having its services listed in the individual I.U. catalogs school districts will work through their I.U. to obtain all media services, and, when necessary, the I.U.'s will obtain services from the Division. The DEM indicates that this decentralization of the media workload has enabled them to reduce their number of staff personnel.

with materials for nonpublic, non-profit schools.[35] The I.U.'s duties in this process include requesting funds from PDE, purchasing library materials from the vendors on behalf of the individual nonpublic schools, and having the materials shipped to the respective schools; each I.U. is also required to maintain an annual inventory of Title II materials which are "on loan" to each nonpublic school in its area.

The Division maintains five Regional Library Examination Centers. One of these is located in Harrisburg and operated directly by the State, another is operated by Villanova University, and the remaining three are operated by intermediate units (Northwestern Tri-County, Luzerne, and Allegheny I.U.'s). The purpose of these Regional Library Examination Centers is to provide to educators resource materials that are non-circulating (materials cannot be taken out of the library); these educational materials are generally for the purposes of planning, developing, and revising curriculum. ESEA Title II federal monies are available for program funding; each of the Centers receives approximately $40,000 per year for operational expenses and roughly $20,000 for new materials from this federal source. Formerly, all of the Centers were operated directly by the state government; when they were turned over to the intermediate units both Luzerne and Allegheny I.U.'s "inherited" approximately $500,000 worth of materials already in the Centers.

11. Bureau of Vocational Education

The Bureau of Voc-Ed has extensive involvement with some I.U.'s and almost no contact with others. The following paragraphs provide information on some of the programs administered through the Bureau which involve one or more intermediate units.

a. Area Vocational-Technical Schools (AVTS) - Five separate I.U.'s (Nos. 3, 19, 23, 25 and 29) currently operate AVTS's.[36] These I.U.'s submit budgets for the AVTS's to the Bureau of Voc-Ed and in turn receive their state operating subsidies for the schools as approved by the Bureau. The AVTS's also receive various federal grants (especially for construction and equipment) through the Bureau.

b. Federal Grants for Vo-tech Education of the Disadvantaged or Handicapped - The Bureau is responsible for administration of approximately $3 million annually in federal grants for vocational education related services for handicapped or disadvantaged children; about 40% of this amount was

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35/ In FY 1974-75 about $686,000 (15% of the total statewide allotment for ESEA Title II) was administered by the I.U.'s to purchase library materials for nonpublic schools. The Division of School Library Services indicated that it has asked I.U.'s to become involved in this program because it believes they can accomplish the task more efficiently and economically than the Division acting alone.

36/ These I.U.'s operate thirteen separate vo-tech schools; each of the schools has a board of directors which is separate and distinct from the I.U. board.

provided to I.U.'s in FY 1975-76. The Bureau of Voc-Ed reports formal control procedures (including on-site visitations) in relation to projects financed with these federal funds. Some of the projects funded include: food services training, trades instruction, and on-the-job training for high school age educable mentally retarded students.

c. Vocational Education at Correctional Institutions - Federal grants totaling approximately $2 million per year are distributed through the Bureau (in cooperation with the Office of Corrections, see pages 35 and 157 of this report) for the education programs at the state prisons and youth detention centers; the majority of these correctional institution programs involve intermediate units.

d. Adult Basic Education (ABE) - This is a federally funded grant program (90% federal - 10% state/local) intended to deliver basic education skills training (reading, arithmetic, English, citizenship, etc.) to adults. The Bureau awards grants under the program on a competitive basis to local education agencies, including both local school districts and intermediate units.[37] Most of the intermediate unit effort in ABE involves services to institutional residents (especially prisons and mental hospitals); only about 30% of the I.U. ABE monies are for community based programs.

e. Comprehensive Employment Training Act (CETA) - This is a federally funded program under which grants are available to provide employment training to unemployed and underemployed persons; two I.U.'s (Delaware County and Schuylkill) received a combined total of $53,000 in FY 1974-75 under CETA (about 1% of the approximately $4 million available for program grants).

f. In addition to these specific project or program related interactions, the Bureau of Voc-Ed reported that it solicits the cooperation of the various I.U.'s in areas such as in-service programs for practicing vocational education teachers and dissemination of certain information (especially information considered non-crucial) which the Bureau wishes to provide to school districts.

12. The Bureau of Information Systems

This Bureau is not a part of the Office of Basic Education; but, rather, it serves the PDE as a whole (i.e., higher education, basic education, state library, etc., as needed). Its functions include research, statistical and data processing services.

The main reason that a section of this report is devoted to The Bureau of Information Systems is that in the Spring of 1975 the Bureau submitted to the State Board of Education a beginning plan for a statewide

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37/ Bureau of Voc-Ed personnel report that I.U.'s are neither especially sought nor discouraged from participation in relation to school districts; of $4 million available for ABE in FY 1975-76, about 18% was awarded for I.U. operated programs.

educational information computer network,[38] proposing that the network be organized at the intermediate unit level and requiring operational activities by I.U.'s. Controversy erupted over the proposed plan. At a State Board public hearing on the matter, representatives of the intermediate units supported the intention to economize by coordinating usage of computers and to systematize the information on a statewide basis; but, at the same time, they challenged the authority of the State Board of Education to mandate a program that would usurp the intermediate units' local-control-of-program prerogative as was purported to be the case with the Bureau of Information Systems' plan. The State Board did not approve the proposal as developed by the Bureau of Information Systems; instead, it charged the PDE (at its November, 1975 meeting) with the responsibility to develop additional information on the computer network issue, taking into account the ideas of school districts, intermediate units and others.

38/ A research project on a statewide computer network was conducted by Central Susquehanna Intermediate Unit in conjunction with the Bureau of Information Systems and a brief description of the project is included on page 84 of this report.

B. Description of Intermediate Unit Operations and Programs

This part of this report is intended to give the reader an understanding of how intermediate units operate and what types of programs they deliver.

It is divided into four subsections: The first section, General Information on Intermediate Units, includes information on geographical size, location, enrollments, employees, classrooms, and I.U. executive director's salaries. The second section, Organizational and Office Structure of Intermediate Units, which begins on page 51, is a description of how I.U. personnel and offices generally are organized and physically deployed. The third section, which begins on page 54 provides a description of programs and services generally offered by the intermediate units, and the fourth section, beginning on page 95, provides the opinions of I.U. executive directors on certain issues.

1. General Information on Intermediate Units

The originating legislation created twenty nine intermediate units and specified their boundaries by assigning specific school districts to respective intermediate units. Since that time there have been no intermediate unit boundary changes. As can be seen on the map of intermediate unit boundaries (Chart C on the following page) the boundaries are roughly along county lines with most I.U.'s consisting of more than one county. The geographical size varies considerably with BLaST (#17) and Appalachia (#8) Intermediate Units being the two largest and Pittsburgh (#2), Philadelphia (#26), Delaware (#25), and Beaver (#27) being the four smallest in territory. Chart D (see page 49) includes the number of counties as well as the number of square miles per intermediate unit.

Chart D also includes data on the public and nonpublic school enrollment, and the number of teachers and administrators per I.U. On the basis of public school student enrollment, Philadelphia Intermediate Unit is the largest with 267,525 students and Allegheny, Montgomery County, and Bucks County Intermediate Units the next three largest with student enrollments of 215,295, 117,701, and 99,968 respectively. The three smallest I.U.'s by public school enrollment are Schuylkill, Seneca Highlands, and Tuscarora with enrollments of 26,278, 25,458, and 25,280 respectively. The largest nonpublic school enrollment is in Philadelphia Intermediate Unit with 125,272 students, and Tuscarora Intermediate Unit has the least number of nonpublic students with an enrollment of 893 students.

Based on the data from Chart D, an average intermediate unit would include about 1500 square miles in geographic area: it would consist of 17 public school districts with about 77,360 students, 4,265 teachers and 216 administrators. Its area would include 2.3 counties.

Chart E on page 50 includes data on employees and classrooms of the intermediate units.[38] Based on the number of employees, the three largest

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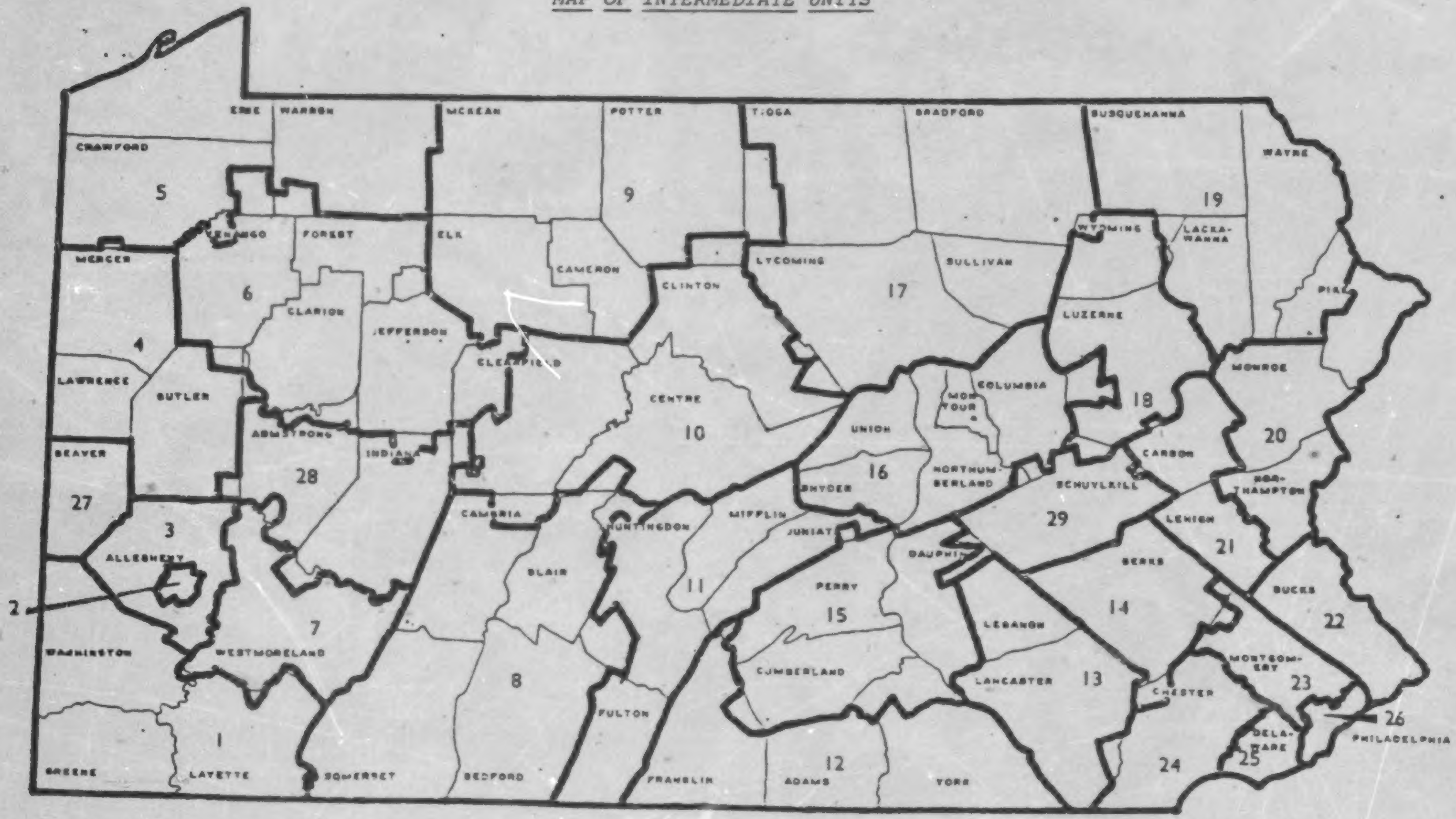
[38] Please note that the data set forth on Chart E and in the following paragraphs is based on information received from only 27 of the 29 intermediate units. Data is not included for Philadelphia and Clarion Manor Intermediate Units.

CHART C

MAP OF INTERMEDIATE UNITS



ERIE
WARREN
MCKEAN
POTTER
TIOGA
BRADFORD
SUSQUEHANNA
WAYNE
CRAWFORD
5
9
19
VENANGO
FOREST
ELK
CAMERON
WYOMING
LACKAWANNA
MERCER
6
CLINTON
LYCOMING
17
SULLIVAN
PIKE
CLARION
JEFFERSON
LUZERNE
4
CLEARFIELD
MONROE
LAWRENCE
BUTLER
CENTRE
MONTOUR
COLUMBIA
18
ARMSTRONG
10
UNION
CARBON
20
BEAVER
INDIANA
16
NORTHUMBERLAND
28
SNYDER
SCHUYLKILL
NORTHAMPTON
27
CAMBRIA
MIFFLIN
29
3
HUNTINGDON
JUNIATA
LEHIGH
ALLEGHENY
DAUPHIN
21
BERKS
BLAIR
11
BUCKS
2
PERRY
14
22
7
15
LEBANON
WASHINGTON
WESTMORELAND
CUMBERLAND
MONTGOMERY
8
LANCASTER
13
23
CHESTER
FULTON
26
DELAWARE
PHILADELPHIA
1
12
25
24
GREENE
FAYETTE
SOMERSET
BEDFORD
FRANKLIN
ADAMS
YORK

1 Intermediate Unit I
2 Pittsburgh-Mount Oliver
3 Allegheny
4 Midwestern
5 Northwest Tri-County
6 Clarion Manor
7 Westmoreland
8 Appalachia
9 Seneca Highlands
10 Central
11 Tuscarora
12 Lincoln
13 Lancaster-Lebanon
14 Berks County
15 Capital Area
16 Central Susquehanna
17 BLaST
18 Luzerne
19 Northeastern Educational
20 Colonial Northampton
21 Carbon-Lehigh
22 Bucks County
23 Montgomery County
24 Chester County
25 Delaware County
26 Philadelphia
27 Beaver Valley
28 ARIN
29 Schuylkill

Source: Pennsylvania Department of Education

CHART D

PHYSICAL SIZE AND NUMBER OF MAJOR ENTITIES SERVED BY INTERMEDIATE UNITS

I.U.	Sq. Miles* Per I.U.	# Counties Per I.U.	# Public Schl. Dist.	# Non-Pub.** Schl. Org.	Pub.Schl.** Enrollment	Non-Pub.** Enrollment	#Pub.Schl.** Teachers	#Pub.Schl.** Administr.	#Non-Pub.** Administr. & Teachers
1	2,217	3	25	28	88,680	4,919	4,491	257	217
2	54	-	1	1	65,036	27,229	3,794	259	1,093
3	675	1	46	40	215,295	33,108	11,142	649	1,654
4	1,825	3	27	33	82,500	4,725	4,056	194	282
5	2,658	3	17	5	84,428	13,246	14,972	194	780
6	2,897	4	17	***	***	***	***	***	***
7	1,034	1	17	37	83,490	8,210	3,962	187	465
8	3,457	4	35	51	93,812	10,350	4,051	232	548
9	3,304	4	14	10	25,458	3,199	***	***	***
10	3,061	3	12	13	43,000	1,059	2,065	51	61
11	1,998	4	9	12	25,280	893	1,353	60	40
12	2,127	3	25	49	92,990	7,028	4,965	276	463
13	1,287	2	22	115	88,583	10,965	4,425	300	435
14	937	1	18	36	63,595	6,150	3,550	215	270
15	1,698	3	24	41	95,276	8,526	5,671	266	514
16	1,764	5	17	19	48,487	3,928	***	***	***
17	3,914	4	19	15	54,439	1,726	2,541	147	102
18	1,211	2	12	52	64,870	12,591	2,965	199	531
19	2,360	3-1/2	20	6	58,190	9,113	3,071	104	325
20	1,306	2-1/2	13	7	59,940	8,156	2,904	173	386
21	746	2	14	28	57,283	7,145	2,743	137	272
22	615	1	13	52	99,968	20,289	5,818	527	916
23	462	1	22	140	117,701	39,458	6,678	397	2,326
24	757	1	12	54	62,842	6,818	3,814	188	657
25	169	1	15	92	96,636	39,910	5,659	354	1,749
26	130	1	1	232	267,525	125,272	13,687	629	***
27	442	1	15	12	46,268	2,905	2,229	114	148
28	1,416	2	11	14	35,555	1,572	1,789	87	89
29	788	1	12	26	26,278	5,774	1,288	60	293
Average	1,562	2.3	17.4	42	77,359	14,629	4,265	216	586
Total	45,309	67	505	1,220	2,243,405	424,264	123,683	6,256	14,616

*Source: Division of Educational Statistics, PDE.

**Source: Intermediate units' responses to L.B.&F.C. questionnaire. Data based on the 1974-75 fall enrollment.

***Data not reported by intermediate unit.

CHART E

INTERMEDIATE UNIT EMPLOYEE AND CLASSROOM DATA FOR THE 1974-75 SCHOOL YEAR

I.U. Name & Number		# I.U. Employees	# Employees With Salary Over $20,000	Ex. Direct. 1974 - 75 Salary	% Of Employees In Spec. Education	# Of I.U. Operated Classrooms
Intermediate Unit I	(1)	451	3	$26,500	84	166
Pittsburgh-Mt.Oliver	(2)	91	0[c]	N/A[b]	0[c]	0[d]
Allegheny[a]	(3)	1,295 (65)[a]	24	40,000	71	452
Midwestern	(4)	313	3	28,300	54	100
Northwest Tri-County	(5)	283	13	34,000	76	108
Clarion Manor	(6)	DATA NOT RECEIVED			DATA NOT RECEIVED	
Westmoreland	(7)	345	6	27,500	93	144
Appalachia	(8)	616	7	26,500	55	227
Seneca Highlands[a]	(9)	169 (2)[a]	4	24,200	76	55
Central	(10)	222	3	24,750	75	76
Tuscarora	(11)	53	2	21,000	81	10
Lincoln	(12)	510	3	32,000	72	180
Lancaster-Lebanon	(13)	435	6	28,775	50	67
Berks County	(14)	498	6	29,355	53	132
Capital Area	(15)	456	8	29,500	87	101
Central Susquehanna	(16)	343	4	29,000	78	89
BLaST	(17)	202	6	26,750	87	81
Luzerne	(18)	356	5	33,043	76	112
Northeastern Educational[a]	(19)	590 (98)[a]	5	33,948	52	154
Colonial Northampton	(20)	273	5	28,000	89	93
Carbon-Lehigh	(21)	192	6	30,000	76	55
Bucks County	(22)	340	20	38,400	71	54
Montgomery County[a]	(23)	656 (262)[a]	28	34,000	62	119
Chester County	(24)	572	8	30,500	72	125
Delaware County[a]	(25)	563 (140)[a]	10	37,250	62	177
Philadelphia	(26)	(e)	(e)	N/A[b]	(e)	(e)
Beaver Valley	(27)	208	6	30,875	90	64
ARIN	(28)	96	1	22,605	85	20
Schuylkill	(29)	161 (83)[a]	4	25,925	85	52
Total		10,289 (650)[a]	196	-	-	3,103
Average		381	7	$29,718	74%	118

(a) Intermediate units that are operating agents for Area Vocational-Technical Schools. The number of employees at AVTS's is shown in brackets and is not included in the I.U. employee column.

(b) The School District Superintendent serves as the I.U. Executive Director and does not receive compensation other than his school district salary.

(c) Includes office staff and nonpublic school personnel; all other I.U. services were subcontracted to the Pittsburgh School District or other agency.

(d) Special Education classes are delivered by school district personnel via contract with I.U. special education funds.

(e) Data submitted included school district employees and classrooms.

SOURCE: Legislative Budget and Finance Committee Questionnaire reporting intermediate units in 1974-75 were Allegheny with 1,295 employees, Montgomery with 656 employees and Appalachia with 616 employees. The three reporting intermediate units with the least number of employees were ARIN with 96 employees, Pittsburgh-Mount Oliver with 91 and Tuscarora with 53 employees. The average number of intermediate unit employees for the 1974-75 school year was 381.

Most reported intermediate unit employees are involved in special education - 93% in Westmoreland, 90% in Beaver Valley, and 89% in Colonial Northampton; the lowest percentage of I.U. employees in special education are 50% in Lancaster-Lebanon, 52% in Northeastern Educational and 53% in Berks County (not counting I.U. #2, see footnote c on Chart E). The average percentage of reported intermediate unit employees involved in special education is 74%. The chart also displays the number of classrooms operated by each reporting I.U.; as indicated, the average number of I.U. operated classrooms is 118.

As shown on Chart E , Montgomery County I.U. has 28 employees whose salary was over $20,000 during FY 1974-75; Allegheny I.U. had 24 such employees, and Bucks County I.U. had 20. The average number of employees per reporting intermediate unit with salaries over $20,000 per year was seven for FY 1974-75. The highest paid I.U. executive director in FY 1974-75 was with Allegheny I.U. at $40,000 per year; and the next lower ones were Bucks County at $38,400, and Delaware County at $37,250. The average intermediate unit executive director salary was $29,718 for FY 1974-75.

2. Organizational and Office Structure of Intermediate Units

Chart F on the following page illustrates the organizational structure of a hypothetical intermediate unit. Seven major program areas have been designated under which there is a list of the principal functions that are likely to be included in each program area. The purpose of the Chart is to give an indication of the wide range of intermediate unit activities while giving specific examples of commonly offered services among the intermediate units. Chart F does not represent any particular intermediate unit and only a few of the largest are likely to offer all of the services listed. On the other hand, there are a multitude of less commonly offered services that are not included on Chart F. Additionally, Chart F does not include "hidden" services[39] provided by the I.U.s, such as frequent individual consultation

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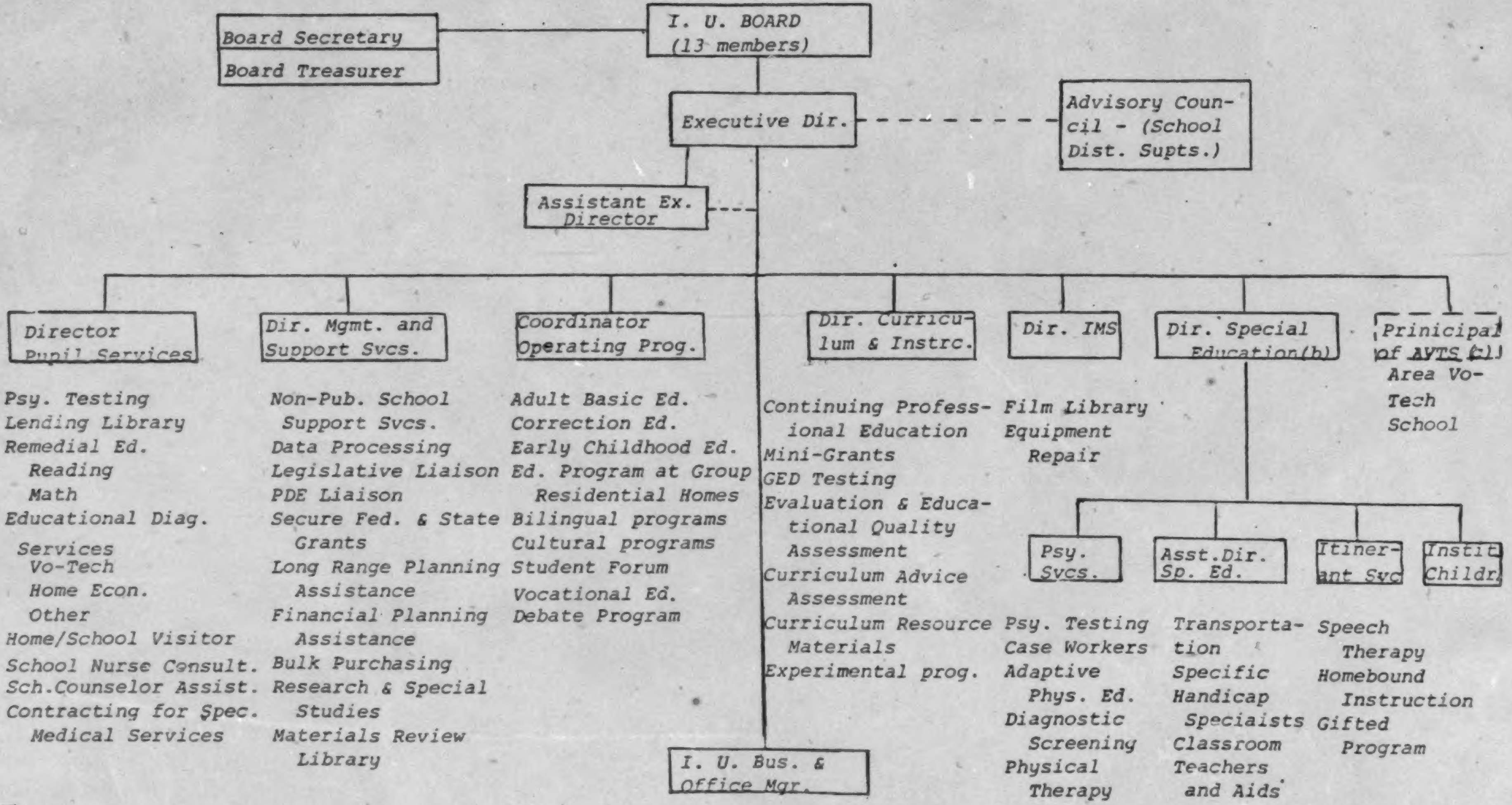
39/ Many of the "hidden services" provided by I.U.'s to school districts result from personal relationships which develop between I.U. staff personnel and school district superintendents; they also result from I.U. staff's unique position of being in frequent contact with all local school district superintendents (and, therefore, being aware of their common problems and the range of "solutions" used by individual superintendents), area local government officials (county commissioners, city officials, etc.), PDE personnel and others. Some of these "hidden services" include: assistance to school board in recruitment and selection of a new superintendent, providing a certificated person from the I.U. staff to serve as a school district superintendent on a temporary basis, collection and dissemination to districts of information of common interest to all (teacher salary scales, e.g.), providing forums for the exchange of ideas among similar classified personnel from the various school districts (business managers, curriculum directors, etc.) and others.

CHART F

AMALGAMATION OF INTERMEDIATE UNIT ORGANIZATION CHARTS (a)


Board Secretary
Board Treasurer
I. U. BOARD (13 members)
Executive Dir.
Advisory Council - (School Dist. Supts.)
Assistant Ex. Director
Director Pupil Services
Psy. Testing
Lending Library
Remedial Ed.
Reading
Math
Educational Diag.
Services
Vo-Tech
Home Econ.
Other
Home/School Visitor
School Nurse Consult.
Sch.Counselor Assist.
Contracting for Spec. Medical Services
Dir. Mgmt. and Support Svcs.
Non-Pub. School Support Svcs.
Data Processing
Legislative Liaison
PDE Liaison
Secure Fed. & State Grants
Long Range Planning Assistance
Financial Planning Assistance
Bulk Purchasing
Research & Special Studies
Materials Review Library
Coordinator Operating Prog.
Adult Basic Ed.
Correction Ed.
Early Childhood Ed.
Ed. Program at Group Residential Homes
Bilingual programs
Cultural programs
Student Forum
Vocational Ed.
Debate Program
Dir. Curriculum & Instrc.
Continuing Professional Education
Mini-Grants
GED Testing
Evaluation & Educational Quality Assessment
Curriculum Advice Assessment
Curriculum Resource Materials
Experimental prog.
Dir. IMS
Film Library
Equipment Repair
Dir. Special Education(b)
Psy. Svcs.
Psy. Testing
Case Workers
Adaptive Phys. Ed.
Diagnostic Screening
Physical Therapy
Asst.Dir. Sp. Ed.
Transportation
Specific Handicap Speciaists
Classroom Teachers and Aids
Itinerant Svc
Speech Therapy
Homebound Instruction
Gifted Program
Instit Childr
Prinicipal of AVTS (c)
Area Vo-Tech School
I. U. Bus. & Office Mgr.

(a) This organizational chart does not depict any particular intermediate unit, nor even a typical intermediate unit. Rather it depicts typical intermediate unit organization and denotes the more common activities that may be conducted in each of the major categories.
(b) 74% of intermediate unit personnel are employed in special education positions.
(c) Only five intermediate units are operating agents for AVTS's.

with school district superintendents. Also, when looking at the Chart, the reader should be aware that an average of 74% of intermediate unit employees are involved in the special education area, and the great majority of these special education personnel are classroom teachers and aides and speech therapists.

Typically, the employees of an intermediate unit are headquartered in a central office (with the exception of the special education classroom personnel). The central office most often includes the executive director and other staff personnel including assistant executive directors, supervisors, program specialists, and administrative personnel. Additionally, the central office often houses program activities such as the film library, curriculum library, and data processing; however, these program activities in some intermediate units are located elsewhere because of space problems, special contractual arrangements, more suitable location, or other reason.

The central office also, at times, includes space utilized as a working area or "home base" for itinerant special education teachers and specialists; this home base for itinerant personnel is oftentimes located elsewhere, however, for reasons the same as cited above for program activities. Also, the central office usually has a large meeting room utilized for I.U. Board meetings, I.U. Advisory Council (school district superintendents) meetings, and other working groups or conferences in program areas such as special education or curriculum.

"Satellite" or area offices are maintained by some intermediate units that are geographically large or include an area that is particularly distant from the central office. These area offices may be used as a home base for the speech therapists, psychologists and other specialists, and thus these persons are not required to travel excessively (perhaps 50 to 75 miles one way) for daily routine business. The area office may serve also as a central location for distribution of instructional materials and films or like material to the area schools. Additionally, the area office is often used by the executive director and other supervisors and program personnel when they are working in that locale. For instance, executive directors may utilize these facilities to conduct business meetings with small groups of school district personnel from the various school districts.

Intermediate unit employees, who are special education teachers or teachers' aides, are geographically spread throughout the intermediate unit territory. Special classes are located in public school buildings (which are "rented" from the particular school district) as well as special education centers which are leased and maintained by the I.U.'s themselves. The arrangement or "mix" of special classes in public school buildings versus special education centers depends upon the particular intermediate unit and its circumstance. Generally, the I.U. operated special classes located in public school buildings are only one or two in number per building. Special education centers maintained by the I.U.'s vary in size; some are located in church facilities or other community centers; old schools abandoned for use by school districts are also used by I.U.'s for such centers. The number of special classes per center may vary from one class to ten or more. A few of the I.U.'s, e.g. Allegheny Intermediate Unit and Chester County I.U., operate large, modern special education centers which were constructed specifically to serve handicapped pupils and are comparable in design and atmosphere to the best of public school district buildings. The nine "special schools" operated by the Allegheny Intermediate Unit include about 20 to 25 separate classes each and serve virtually all types of exceptionalities.

There appears to be a tendency among I.U.'s to locate in the special education centers the types of classes that consist of children whose exceptionality is such that they must be gathered from a large geographic area (usually across school district lines) in order to have in one place sufficient children of that exceptionality to make up a class. Examples of such classes are: the severely mentally retarded, the profoundly mentally retarded, severely hard of hearing, multiply handicapped and physically handicapped. Another consideration is that such children can be better served with special support services (and required building modifications) in these special education centers.

Some intermediate units have had great difficulty in securing public school classroom space and in some cases have had no alternative but to secure facilities other than in public schools. One intermediate unit special education director reported that one of his accomplishments that required persistent and hard work for several years was securing sufficient classroom space in public school buildings that allowed "special education to get out of church basements."

3. Programs and Activities of Intermediate Units

The intermediate units vary greatly in the range of programs and activities which they offer. Whereas one I.U. may limit its activities to only a relatively few particular activities within a few program areas, another neighboring I.U. may carry on a large number of individual projects or activities within a large range of program areas. Charts G and H provide some idea of this range of program areas or services offered among the individual I.U.'s. The charts were developed from reports submitted to this Committee by 27 of the 29 intermediate units (see Chart G, footnote b). concerning their program activities offered during the 1974-75 school year.

Using this reported information, our staff was able to identify 25 particular program areas which generally encompass the range of activities reported by the individual I.U.'s.[40] Please note from Chart H that 4 of the reporting I.U.'s offer services in 12 or less of the cited "program areas", while 6 of the I.U.'s offer services in 19 or more of the named "program areas." Also please note from Chart G that special education, management

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40/ It is important to note that some of the "program areas" cited may include several different reported "projects" by an I.U.. A certain I.U. may have submitted, e.g., three or four separate projects within the program area of "Curriculum Development and Instructional Improvement Services". It is also important to note that the data set forth is for the 1974-75 school year and may differ from services offered by the individual I.U.'s during the current school year.

CHART G

INTERMEDIATE UNIT PROGRAM AREAS, FY 1974-75 (b)

General Program Area	No. of I.U.'s That Offer Service (a)	% of Reporting I.U.'s
Special Education (including pupil transportation)	27	100%
Management Services to School Districts	27	100%
Nonpublic School Services (Acts 194 & 195)(c)	27	100%
Instructional Materials Services to School Districts	26	96%
Curriculum Develop. & Instructional Imp. Services to Districts	25	93%
State and Federal Agency Liaison Services to Districts	24	89%
Continuing Professional Education Services to Districts' Staffs	24	89%
Educational Planning Services to Districts	23	85%
Pre-School Education Programs	22	81%
Vocational Education Programs (including Area Voc-tech School)	21	78%
Pupil Personnel Services	20	74%
Correctional Institution Education Programs	19	70%
Youth Detention Center Education	19	70%
Adult Basic Education Program	17	63%
Fine Arts Program	17	63%
Training of Teacher Aides	16	59%
Adult Secondary Education Program	13	48%
Food Services for Pupils	12	44%
Mini Grant for Teachers Program	11	41%
Education Program at MH/MR Institution	10	37%
Summer Education or Recreation Program	7	26%
Remedial Education Program	6	22%
Post Secondary Education Program	5	19%
Day Care Services Program	3	11%
Education Program for Migrant Workers' Children	3	11%

(a) This column indicates the total number out of 27 reporting intermediate units who reported having an activity which falls into this general program area.

(b) Source of this information was questionnaires returned to staff of Legislative Budget and Finance Committee during summer of 1975 by 27 of 29 intermediate units. Philadelphia and Clarion Manor I.U.'s did not respond.

(c) Since replaced by Act 89 of 1975.

CHART H

NUMBER OF PROGRAM AREAS IN WHICH INTERMEDIATE UNITS OFFER SERVICE, BY I.U., FY 1974-75 (b)

Intermediate Unit		No. of Program Areas Offered (a)
Allegheny I.U.	(#3)	20
Appalachia I.U.	(#8)	20
I.U. Number 1	(#1)	19
Midwestern I.U.	(#4)	19
Berks County I.U.	(#14)	19
Chester County I.U.	(#24)	19
Westmoreland I.U.	(#7)	18
Capital Area I.U.	(#15)	18
Central Susquchanna I.U.	(#16)	18
Luzerne I.U.	(#18)	18
Montgomery County I.U.	(#23)	18
Delaware County I.U.	(#25)	18
Northwest Tri-County	(#5)	17
Schuylkill I.U.	(#29)	17
Lincoln I.U.	(#12)	16
Lancaster-Lebanon	(#13)	16
Northeastern Educational I.U.	(#19)	14
Carbon - Lehigh	(#21)	14
ARIN I.U.	(#23)	14
Tuscarora I.U.	(#11)	13
BLaST I.U.	(#17)	13
Bucks County I.U.	(#22)	13
Beaver Valley I.U.	(#27)	13
Central I.U.	(#10)	12
Senaca Highlands I.U.	(#9)	11
Colonial Northampton	(#20)	11
Pittsburgh - Mount Oliver	(#2)	6

(a) This column refers to the number of "general program areas" as listed on Chart G within which the indicated I.U. has reported at least 1 activity; e.g., I.U. #11 has reported activities that can be categorized into 13 separate "program areas."

(b) Source of information same as for Chart G.

services, nonpublic school services and instructional material services are common to virtually all reporting I.U.'s, while only three reporting I.U.'s offer day care services and an education program for the children of migrant workers.

It is important to note that several I.U.'s carry on specific projects or activities which may not fit into any of the 25 program areas cited on Chart G. For example, Central Susquehanna I.U. conducted a research project that addressed the issue of the advisability of switching the requirements for permanent state certification of teachers from the present standards of "course attendance" to a performance or competency basis.

The following paragraphs (subsection a through t of this report will provide descriptive information to help the reader understand the types of specific activities that are carried on within each of the cited "program areas". Following those descriptive subsections of program areas and beginning on page 74 is a series of descriptions of selected projects or activities reported by the intermediate units which although some of them may fit into one of the broad program areas listed on Chart G, each has sufficiently unique characteristics to warrant an individual description. The projects selected for description are examples and not intended to be all inclusive of noteworthy I.U. activities.

a. Special Education (Including Pupil Transportation) - This is, of course, the key, central activity of all intermediate units. It involves direct delivery of educational services to exceptional persons.[41] It also includes school bus (or other motor vehicle) transportation of pupils to special education classes.[42] Chart I on page 58 displays various statistics relative to I.U. operated special education classes. Not shown separately on the chart are psychological services and testing of pupils, pre-school programs for handicapped children and various Right to Education Activities (see page 30 of this report) all of which are important "special education" program activities of virtually all intermediate units.

Please notice from the chart that I.U.'s employed a total of 5,862 special education teachers during FY 1974-75 to serve a total of nearly 150,000 students, all of whom had at least one of the 11 exceptionalities listed. Also, please take note of the range in pupil/teacher ratios, from a low of 1 teacher for every 8 socially and emotionally disturbed pupils to a high

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[41] Defined by the State Board of Education as "Persons of school age who deviate from the average in physical, mental, emotional, or social characteristics to such an extent that they require special educational programs, facilities or services and shall include all school age persons in detention homes and state schools and hospitals."

[42] Depending on the severity of the individual pupil's handicap and his residence in relation to the I.U. class, this may range from taxi cab reimbursement to mini-bus operation to full size school bus service.

CHART I

SPECIAL EDUCATION SERVICES PROVIDED BY ALL 29 INTERMEDIATE UNITS, FY 1974-75

Type of Exceptionality	No. of Teachers Employed(a)	No. of Pupils Served	No. of Pupils/ Teacher	Percentage of Total Pupils Served(b)
Speech and Language Impaired	980	80,941	83	83%
Educable Mentally Retarded	1,477	20,946	14	49%
Gifted	375	10,366	28	67%
Brain Injured (LD)	726	9,170	13	65%
Trainable Mentally Retarded	726	8,517	12	85%
Detention Home Classes	128	3,942	31	100%
Socially & Emotionally Disturbed	423	3,416	8	68%
Severely/Profoundly Mentally Retarded	368	3,397	9	98%
Hearing Impaired	257	3,283	13	95%
Physically Handicapped	245	3,154	13	90%
Visually Impaired	157	2,350	15	96%
Grand Total	5,862	149,482	26	74%(c)

a/ This column represents the number of properly certificated teachers for each exceptionality.

b/ This column represents the number of children served in I.U. operated programs as a percentage of total children served in both I.U. operated and school district operated special education programs for each particular exceptionality.

c/ School district operated special education programs served about 52,000 pupils.

d/ I.U.'s are responsible for operation of all youth detention centers education programs.

Source: Special Education, Programs/Services, 1974-1975, PDE, 1976 of 83 speech and language impaired pupils for each such teacher.

Also shown on Chart I is the percentage of children in intermediate unit operated special education services as compared to all special education children being served in the total public school system. As can be seen, I.U.'s serve nearly all of the severely and profoundly mentally retarded, visually impaired, hearing impaired and physically handicapped children; whereas, on the other hand, local school district operated classes served the majority (51%) of all educable mentally retarded (i.e., MR children with the relatively highest I.Q.) children during the 1974-75 school year. Please notice that, in total, I.U. programs served about 74% of the approximately 200,000 exceptional persons enrolled in public school system special education programs in 1974-75.

The reader will notice as he continues in this section of the report that many of the activities of I.U.'s categorized under other "program areas" in Chart G on page 55 are closely allied with and to some degree a part of the special education effort (e.g., youth detention education, food service, MH/MR institutional programs, some vocational education activities, training teacher aides, etc.). The reader will also gain further insight into special education activities of I.U.'s by referring to pages 31 through 33 of this report which describe certain activities of the PDE Bureau of Special and Compensatory Education.

Several intermediate units are deeply involved in school bus transportation of pupils, operating their own system of mini-buses, station wagons and other vehicles (in some cases specially equipped to handle severely handicapped children) for home "pick-up" and "delivery" of students who attend their special education classes. A few intermediate units have declined to get substantially involved in pupil transportation themselves, however, choosing instead to be dependent on the bus services of the local school districts in which their special education students reside.

A fiscal discussion of state support for special education (and pupil transportation) begins on page 143 of this report; it includes an analysis of state support (for special education and for transportation) per special education student per I.U. during FY 1974-75.

b. Management Services - This program area includes a diverse range of specific activities; some of the particular activities reported by I.U.'s are as follows:

(1) Financial Management and Long Range Planning - including (a) establishment of school business managers' committee to investigate ways for districts to invest cash, (b) completion of school building surveys as requested by the PDE and local districts, and (c) assistance to school districts with budgeting through program cost analysis, including item comparisons in special areas such as tax collection, legal services, and transportation.
(2) Data Processing Services - particular services include payroll processing, class scheduling, student attendance records, student grade reporting and others.

(3) Union Negotiations Assistance - Examples of particular services reported include: (a) providing "up-to-date" information on teacher union "demands, offers, and settlements", (b) publication of annual reports on salary levels and fringe benefits provided by area school districts, (c) establishment of inservice training workshops for school district personnel involved in negotiations (sometimes using expert consultants), and (d) provision of "activities and information to assist administrators in developing positive strategies for collective bargaining."

(4) Bulk Purchasing - This generally involves the purchase of specific materials and supplies for groups of school districts in a sufficiently large quantity to realize a price discount; the most common items reported to be purchased in this manner were audio-visual materials, often through the coordination of the director of the I.U.'s Instructional Materials Service Center.

(5) Publishing of Information Documents - Specifically reported were (a) a "periodic newsletter for distribution to school directors, school personnel, and community agencies", and (b) an annual "directory" of schools within the I.U. area.

c. Nonpublic School Services - There are several references elsewhere in this report to these services which intermediate units are obliged to perform under the provisions of Section 922.1-A of the Public School Code (added by Act 89 of 1975) and directions of the Secretary of Education.[43]

In general, the activities carried on by I.U.'s within this area* involve the hiring of professional staff (on a full or part-time basis) to provide auxiliary educational services to nonpublic school pupils who attend school within the I.U.'s geographic area. Activities of this type also require, of course, a central administrator (and staff) in the headquarters office of the I.U. who develops the specific service program, carries on liaison with the nonpublic school, etc. Some of the authorized auxiliary services cannot by law be provided on the premises of parochial schools; the I.U.'s are therefore either renting mobile instructional units[44] or usable facilities close to parochial school buildings. Several intermediate units have elected (during the current school year and as a result of Act 89 requirements) to "subcontract" with private agencies in order to deliver these auxiliary educational services to nonpublic school children.

d. Instructional Materials Services - The central activity carried on in this program area is operation of an educational film lending library

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43/ See related discussions on pages 7, 21, 39, and 148 of this report.

44/ Self-propelled van type vehicles specifically constructed to the specifications of the intermediate units to serve as mobile instructional rooms.

*See also the activities related to purchase of library materials for nonpublic schools on page 43.

for school districts within the I.U.'s service area. This lending function is carried out via mail or more often via delivery truck(s) which make a regular circuit of school districts that are "members" of the IMS service.[45] There are a number of related activities offered through or in conjunction with the IMS in certain of the intermediate units; they include:

(1) Film production, cleaning and repair;
(2) Bulk purchase and/or repair of audio-visual equipment for school districts (including movie projectors, televisions, tape recorders, etc.);
(3) Video tape production and duplication;
(4) Serving as liaison between school districts and the appropriate educational television station;
(5) Inservice education to teachers and A-V staff members of local school districts; and
(6) Other services.

e. Curriculum Development and Instructional Improvement Services (Including Fine Arts and Mini Grants for Teachers) - There are a great many different types of activities carried on by the various intermediate units within this program area, ranging from short term consultative services for school districts in direct response to specific requests from school district staff members to major projects (often funded by the federal government and perhaps encouraged by the state government) which have virtually no direct immediate service impact on the school districts within the I.U.'s service area; examples of this latter type of activity are the "Governor's School for the Arts" and the "Arts in Education" projects described on pages 41 and 42 of this report.[46]

A sample of specific activities reported by I.U.'s within this program area are as follows:

(1) Response to the curricular needs of the component school districts and provision of consultative services as requested;
(2) Provision of "leadership" for "Curriculum Coordinators" of the various school districts;
(3) Investigation and study of the latest developments and innovative procedures that result in curriculum improvement and setting up programs and workshops to pass this information along to classroom teachers of school districts within the I.U. area;
(4) Maintenance of an up-to-date resource of periodicals, study guides, course outlines, and other

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45/ Not all school districts participate in this service in some I.U.'s.
46/ A number of other specific curriculum related "projects" of intermediate units are described within the subsection of this report entitled "Descriptions of Selected Individual I.U. Projects" which begins on page 73.

curriculum materials; and
(5) Operation of a regional non-lending library or examination center for area teachers to visit and examine textbooks or other curriculum materials.

Fine Arts and Mini Grants for Teachers are two program areas listed on Chart G which although identified separately by many I.U.'s could generally be included within the Curriculum Development and Instructional Improvement Services category.

As described on page 42 of this report, all I.U.'s are involved to some degree in the "Governor's School for the Arts"; additional "fine arts" activities and/or objectives listed by some of the reporting I.U.'s included:

(1) Development of a resource file of local artists to work in schools;
(2) Sponsorship of traveling art and other shows;
(3) Enabling students to view high quality, original "works" in various media;
(4) Enabling students to see the relationship that art has with our cultural heritage;
(5) A traveling "children's theater"; and
(6) A "Saturday" arts and crafts program.

The "mini-grant" program for teachers (and administrators) was reported as offered by 10 intermediate units in FY 1974-75. The basic intention of this program is to improve education by encouraging experimentation and innovation at the individual classroom or school level. Under the program, teachers (or other school professionals) make application to the intermediate units to receive funding for innovative projects that require only small amounts of money to implement (e.g., $50 or $100). In this way, the individual classroom teacher has an opportunity to try a new instructional technique or curriculum approach which would be impractical for direct funding from the state or federal government level. Generally, results of the funded projects are periodically reported by the I.U.'s to school districts within their service area.

f. State and Federal Agency Liaison - Major activities carried on within this program area include (1) coordination of area school district contacts with the Pennsylvania Legislature, the State Department of Education and other state and federal agencies, and (2) securing of grants available for special projects.

In regard to the former activity, several intermediate units have fulltime staff members[47] whose primary function includes organization of and

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47/ It is important to note that the respective I.U. staff personnel of this type work to some degree in cooperation with each other and with the "legislative committee" of the Pennsylvania Association of Intermediate Units (See footnote 5 on page 28 of this report).

service to a local "legislative issues committee" of school district representatives from their area; among other activities, these staff persons travel to Harrisburg and sometimes Washington, and meet with legislators to present the "point of view" of their legislative committee, receive official legislative documents (bills, calendars, histories, etc.) for distribution to appropriate district personnel, and maintain relationships with legislators from their local I.U. area.

Intermediate units involved in the "securing of grants" employ staff persons who become aware of and make application for grant monies available from the federal and state governments.[48] Some of these persons become "experts" in "grantsmanship", maintaining reference files on state and federal laws and regulations which pertain to grant programs; they also assist school district personnel in the preparation of federal and state grant applications. In some cases, these state and federal agency liaison staff persons will also serve (after receipt of certain grants) as project administrators, responsible for implementing the specific activities funded by a particular grant. Many of the I.U. reported activities described in subsection u which begins on page 73 of this report are fully funded by the federal government and are, in fact, specific results of this activity of "securing of grants".

g. Continuing Professional Education - Activities carried on by intermediate units within this program area are generally aimed at updating and improving the skills of various "professional" employees of the school districts (including administrators, business managers, guidance counselors and others); the activities are also aimed at helping teachers meet the state requirement to complete at least 24 "credits" worth of educational course work after college graduation in order to be permanently certified as a teacher. (The teacher must obtain these 24 post graduate credits within a maximum of 6 teaching years.)

Specific continuing education activities reported by I.U.'s include:

(1) Operation of an "In-service Council" (See page 40 of this report for description of the duties of this council.);
(2) Offering of education "courses" for school district personnel; such courses may be offered during the afternoon, evening, or on weekends and may or may not provide "credits" to persons who complete them.[49] These courses sometimes include a tuition charge; they are generally "taught" by an expert area teacher, college instructor, I.U. staff person, or other community resource "expert".
(3) Offering of workshops on specific subjects for school district personnel; these workshops are sometimes

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[48] As described in Section IV of this report, federal grant monies are often available "through" the PDE.
[49] Some higher education institution personnel have expressed their belief that intermediate units, in effect, compete with local colleges for graduate students.

conducted in conjunction with PDE personnel and are generally aimed at dissemination of the latest developments to and exchange of ideas among personnel who have similar duties from the respective school districts. Several of the intermediate units maintain large meeting room facilities (often in their central office headquarters location) specifically for the purpose of conducting workshops (and education "courses").

h. Educational Planning Services - Examples of activities reportedly carried out by I.U.'s within this program area include the following:

(1) Liaison between school districts and the PDE on the approval of school construction projects, on the development by local districts of "long range development plans" and on implementation of "educational quality assessment" (see pages 38, 33, and 34 of this report);
(2) One particular I.U. reported the objectives of its activities in this area as: "To assess educational needs of the Intermediate Unit community; to promote awareness of these needs; and to assist agencies and school districts in the development and evaluation of new educational programs...";
(3) Another I.U. reported the following objectives (among others): "To assist districts to establish priorities in planning and research" and "To assist administrators in designing research projects".

i. Pre-School Education and Day Care Programs - Pre-school education programs operated by intermediate units are mostly "pre-school special education" for "exceptional children" and are generally federally funded with money channeled through PDE.[50] Some selected quotations of stated objectives for activities within this program area as reported by I.U.'s are "To provide services to pre-school handicapped children" and "Through early identification and intervention to establish a broad foundation upon which the child's future education and life planning may be built."

At least one intermediate unit reported that it operated a "Head Start" Program in FY 1974-75 which was funded jointly by the federal and state governments. The objective of the program was reported as: "To provide Health, Educational, Social Services, Nutritional, and Parent Involvement services to children enrolled in the program and their families based on the

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50/ One particular pre-school service carried out by intermediate units, e.g., is generally organizationally a part of the "special education" program and involves identification and diagnostic evaluation of pre-school age children who may be mentally retarded in order to better plan for their future educational needs.

premise that the parent is the prime educator of the child." Enrollees are from low income families and 10% of enrolled children must be handicapped.

Chart G on page 55 contains "day care" as a separately listed program area offered by 3 intermediate units: this activity is related, of course, to pre-school education. The following paragraphs provide background information on the specific day care related services reported by the Berks County and Northeastern Educational Intermediate Units.

The Berks County I.U. reported three separate "Education and Day Care Services" programs costing a total of about $1.5 million in FY 1974-75 and involving an aggregate total of over 500 children ranging in age from 6 months to 12 years old. As an example, one of these three reported programs, called "Family Day Care", was reported as consisting of 50 day care homes located throughout the city of Reading and Berks County; it was funded with 25% local and state funds and 75% federal monies (total 1974-75 cost was $672,000). This Family Day Care Program was reported as having 55 full-time and 37 part-time employees in FY 1974-75 and providing a full range of supportive services, including medical, psychological, social services, education, nutrition, and transportation. Objectives for this particular program were reported as:

> (1) To provide children with an atmosphere and with experiences that will enable them to develop physically, emotionally, socially, and cognitively.
> (2) To provide children with experiences that will promote development of a positive self-image.
> (3) To identify developmental lags and health problems in children and work towards remediation.
> (4) To provide quality child care services for parents so that they may obtain gainful employment and/or training.

Another of the three reported Berks County I.U. Programs, one entitled "The School Age Program," ...provides kindergarten and After-School care for children of working mothers, WIN candidates, and work/training parents, at 5 centers...."

The Northeastern Educational I.U. reported a day care service program which is operated under contract with the Lackawanna County Commissioners and with funding received through the Pennsylvania Department of Public Welfare. The day care service is delivered at a large center located in the City of Scranton. The following descriptive information about the program was reported by N.E.I.U.:

> "The basic aim of the Day Care Program is to meet the needs of children, ages eighteen months through six years, which will enable them to obtain experience which will foster their positive growth and development as human beings."

> "This service is provided to those children of financially and categorically eligible families, and determined by the

appropriate Board of Public Assistance."

j. Vocational Education Services - A total of six intermediate units reported that they served (during FY 1974-75) as "operating agent" for at least one area vocational-technical school (AVTS). In total, the six I.U.'s reported operation of 13 AVTS's, employing 650 staff persons. The breakdown of AVTS's and employees per I.U. is as follows:

	No. of AVTS's[51] Operated	No. of Employees at AVTS's
Allegheny I.U.	2	65
Seneca Highlands I.U.	(3 or 4 in planning stage)	2
Northeastern Educational I.U.	2	98
Montgomery County I.U.	3	262
Delaware County I.U.	3	140
Schuylkill I.U.	3	83

The intermediate units vary considerably in their approach as AVTS operating agents. In some cases, administrative and management activities for the AVTS such as bookkeeping, accounting and payroll, hiring-firing, curriculum planning and budget preparation are closely supervised by the I.U. executive director and, in fact, are clearly a part of the everyday operation of the intermediate unit itself. In the case of the two vocational-technical schools operated by the Northeastern Educational I.U., for example, the official AVTS Board (which is responsible for both schools) reportedly meets only minimally, as necessary, e.g., to appoint the N.E.I.U. as AVTS "operating agent" and to adopt the AVTS budget. The Executive Director of the N.E.I.U. reported to our staff a belief that his intermediate unit will probably maintain this type of close relationship with the AVTS for the forseeable future. The Seneca Highlands I.U. reported anticipation of a similar relationship existing between their I.U. and the AVTS's currently being planned for their area. Other intermediate units serving as AVTS operating agents do not view themselves as permanently maintaining a close organizational relationship with the AVTS; rather, they see themselves as start-up facilitators to assist in operation of the AVTS until the operating agent role can be fully assumed by a "joint committee" appointed by the AVTS Board. The AVTS's under the aegis of the Montgomery County I.U., e.g., have increasingly taken on more and more of their own duties such as bookkeeping and payroll; and, this particular I.U. reported that it expects to be out of the role of AVTS operating agent by July of 1976.

Aside from the area-vocational technical school operating agent role, intermediate units are involved in vocational education and pre-vocational education activities for their own special education students (generally educable and/or trainable mentally retarded students up to the age

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51/ These numbers do not necessarily represent all AVTS's within the respective I.U. areas, but, rather, represent only the AVTS's operated by the particular intermediate units.

of 21) and in connection with other specialized adult and youth education programs (such as corrections education) described elsewhere in this report. A few I.U.'s reported still different vocational-education related activities, such as I.U. Number 28 which reported:

> "ARIN Intermediate Unit serves as chairperson for planning Unit 21 under the Vocational Education Amendment of 1968. They also serve as coordinator and administrator of vocational education programs for disadvantaged students in the planning unit."

Other examples of unique vocational education related programs reported by I.U.'s are "Pennscript" and "Grand View Diploma Nursing Program" which are described on pages 81 and 86 of this report, respectively.

k. Youth Detention Center Education - As discussed on pages 35 and 157 of this report, several I.U.'s operate educational programs at state owned youth development centers and youth forestry camps; in addition, intermediate units serve as the educational agency at county operated or other local detention centers[52] where school age children are held in the custody of the courts (and at other local residential institutions [53]). Specific activities of I.U.'s in carrying out this function vary, of course, according to the size and type of the youth center and particular local desires; in some cases, the I.U.'s have several full time classroom teachers housed on the grounds of the institution under the direction of a school principal; in other cases, the services are provided in a less formal and even part-time staff manner. An example of services within this program area are described by the Westmoreland I.U. in discussing the program that it operates at the Greensburg Detention Center (the program has 1 full-time and 1 part-time employee):

> "The detention classroom provides individual instruction as well as small and large group instruction. The teacher encourages each individual to participate, share, and cooperate. The specific instruction varies with the nature of each person or group. Due to the everchanging population, brief daily units are developed rather than weekly ones...
>
> The program also includes some organized recreational and handicraft activities, discussion periods, current events and vocational exploration. Through the use of these

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[52] PDE Standards for Special Education require I.U.'s to operate classes in county detention homes; see page 20 of this report. These classes are considered by PDE as a part of the I.U.'s "Special education" effort for budgeting and reporting purposes; see Chart I on page 58.

[53] At least one intermediate unit offers educational services, e.g., at a temporary residential home for school age pregnant women.

> activities plus academic instruction an attempt is made to encourage detained individuals to alter their attitudes toward learning, school and teachers...
>
> The teacher attempts, too, to counsel in those areas not directly related to the delinquent act that resulted in detention...
>
> GED sessions are also made available to those who have quit school and are attempting to attain a high school diploma."

1. Adult Correction Institution, Adult Basic and Adult Secondary Education Programs - As discussed at length on page 35 of this report several intermediate units have been deeply involved in operation of the full "official" education program at state-owned prisons.[54] Further discussion on this involvement is set forth on page 157 of this report.

In addition to this involvement by some I.U.'s in the total education programs at state-owned prisons, several other intermediate units offer specialized education services to inmates of both state-owned and local county prisons. Special services offered in these cases generally are either "Adult Basic Education" or "Adult Secondary Education" programs.

Adult Basic Education (or ABE) is a principally federally funded program (with the monies flowing through the PDE; see page 45 of this report) which is intended to deliver elementary level education to adults, especially reading and arithmetic. When I.U.'s supply this service to prison inmates, they generally have a full or part-time teacher visit the prison on a scheduled basis (e.g., three nights per week) to deliver it. In addition to prison ABE programs, several I.U.'s also offer this service to residents of mental or other institutions and to the general public, conducting the classes on the institutional grounds or in a central community location, as appropriate to their service target group. As an example, one particular I.U. reported offering a special ABE class in English for Vietnamese speaking people; this same I.U. reported that it recruits the "public at large" for its ABE program "...via public service announcements on radio and TV...."

Adult Secondary Education differs from ABE services in that it involves high school level education courses and is most often aimed at preparation of adults to take the General Educational Development (GED) test.[55]

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[54] Luzerne I.U., e.g., has several employees at six of the eight state prisons for adults including an individual who serves as co-director of the educational program at each of the six institutions (along with an "Education Director" for the institution who is employed by the Bureau of Correction).

[55] A passing score on this test by persons who "dropped out" of high school before graduation results in awarding of a GED diploma by the Commonwealth; this diploma is generally considered (e.g., for employment purposes) as equivalent to a high school diploma.

Intermediate units involved in adult secondary education activities generally also serve as an agent of the Commonwealth for administration of the GED test. As in the case of ABE, target populations of adult secondary education activities vary among the I.U.'s, ranging from prison, mental and other institutional residents to being offered to the public at large.

m. Pupil Personnel Services - These services are defined in Section 7.1 of the Regulations of the State Board of Education as "A coordinated effort which includes, but is not limited to, guidance, psychological services, health services, and home and school visitor (social work) services." The actual activities carried on by I.U.'s in this program area vary greatly as can be illustrated by the following excerpts from pupil personnel services program "objectives" statements submitted to our staff by the indicated intermediate units:

> I.U. 7 - "To provide diagnostic and consultative services to local school districts for cases [pupils] referred that indicate social maladjustment and/or emotional disturbance."
>
> I.U. 9 - "To provide for the psychological needs of non special education students in the Intermediate Unit 9 area."
>
> I.U. 14 - "To provide personnel responsible for career education an opportunity to research, discuss, develop career education programs."
> "To continue to advise the Student Forum[56] in accordance with the guidelines of the Secretary of Education."
> "To continue to advise the Traffic Safety Council in accordance with the guidelines of the Governor.".
>
> I.U. 15 - "...the development of local guidelines for handling student records."
>
> I.U. 16 - "Conduct career education services for students in local districts."
>
> I.U. 24 - "To provide inservice experiences and consultative support to the school nurses... [and]...guidance counselors in Chester County."

n. Training Teacher Aides - In most cases, intermediate unit activities carried on within this program area involve provision of formal in-service training programs for non-professional employees of the intermediate unit staff who serve as "teacher aides" in special education classes.

56/ This is a PDE initiated activity carried on by nearly all intermediate units; see page 34 of this report for a description.

Such training is considered important to assist unprepared persons to deal with the "special needs" of socially and emotionally disturbed, profoundly mentally retarded and other severely handicapped children. This training service is also sometimes made available to local school districts for teacher aides employed in the district operated special education programs.

Not all teacher aide training activity of I.U.'s is limited to the above, however, as indicated by the following "objectives" statement submitted by the Northeastern Educational I.U. for its "Career Opportunity Program": "The COP Project is designed to train para-professionals at Marywood College and the University of Scranton to earn a teaching degree serving school districts in low-income target areas." Further description of the COP Program indicates that "Beginning COP participants enter the non-instructional teacher aide lattice and advance accordingly to their successful academic training to a teacher assistant with the ultimate goal - certified teacher." The N.E.I.U. reported having 3 full-time and 1 part-time employees assigned to the COP Project and that it was 100% funded with federal monies during FY 1974-75.

o. Food Service Programs - In general, I.U. activities within this program area involve cafeteria operations for provision of hot lunches to pupils of intermediate unit operated special education classes, especially those in I.U. maintained school buildings. Some I.U.'s have delivery programs to transport school lunches from their centrally operated cafeteria facility to I.U. operated classes in churches and other community buildings.

p. MH/MR Institution Education - Intermediate Units are responsible under a directive of the PDE (see page 19 of this report) for operating educational programs for school age children who reside at state-owned institutions for the mentally retarded which are located within their geographic area. They generally carry out this function as a part of their special education program; educational services are generally delivered on the grounds of the state institution both in patient "wards" and in "school" facilities operated in past years by the Department of Public Welfare. In some cases, however, the intermediate units "bus" the institutional residents to community based educational facilities (e.g., a church annex) especially leased to serve these pupils and perhaps mentally retarded students who reside in the community as well. This particular program is fully funded by the state government (See page 157 of this report).

In addition to the activity described immediately above, several I.U.'s offer specialized education services at institutions for the mentally retarded and mentally ill; particularly offered are Adult Basic Education and other adult education programs, both to institutional residents and, in a few cases, to institutional employees; also offered are services to socially and emotionally disturbed school age residents of mental institutions.

q. Summer Education or Recreation Programs - Activities reported by I.U.'s in this program area most often involve summer programs for exceptional children who are enrolled in intermediate unit operated special education classes during the regular school year. As an example, one I.U. reported offering a 6 week "open air" summer program for 124 handicapped children in cooperation with the local Easter Seal Society; this was a 100% federally funded effort ($37,000 cost) which provided students with "...continuity in the academic area (reading and math.), physical therapy, speech therapy, exposure to the performing arts." Two other I.U.'s reported activities in this program area which had the following stated objectives (in part):

I.U. 14 -

> To offer a program of recreation, experiences and activities appropriate to handicapped children of school age for whom there were no other summer recreation programs available in the community;
>
> To continue to encourage and reinforce the acquisition of skills according to the recommendations of each child's classroom teacher; and
>
> To provide families of school age handicapped children with some release time from the care and responsibility attendant to their handicapped child.

I.U. 15 -

> To provide practice in diagnostic-prescriptive teaching for teachers of handicapped children;
>
> To assess the strengths and weaknesses of children and provide appropriate instruction during the summer to maintain and enhance academic and social progress; and
>
> To familiarize teachers with recently developed equipment, materials, tests, and techniques of instruction.

r. Remedial Education Programs - Activities offered by intermediate units within this program area are illustrated by the following objectives reported by various I.U.'s:

(1) To provide special instruction in reading for those students designated by the individual school districts;
(2) To furnish free reading materials for students who lack appropriate items in their homes;
(3) To provide special services to educationally deprived children of normal intelligence who show deficiencies in reading and mathematics; and
(4) To increase the proficiency of special education teachers in working with exceptional (learning disabled) children in reading.

s. Post Secondary Education - Intermediate units are involved in two distinctly different types of post secondary education:[57] (1) educational services for certain special education students under the age of 21, and (2) evening classes for the general adult public.[58] The former type of program can best be illustrated by the following "objectives" statement submitted by the Allegheny I.U.:

> "...objectives have been set up as follows: to offer to handicapped students under the age of twenty-one, who have satisfactorily completed the course of secondary education prescribed for their particular exceptionalities, additional courses in post secondary education in a vocational field suited to their individual needs, with a view of preparing these students to pursue careers either in a socially integrated setting or in a sheltered workshop type setting that will enable them to become fully or partially self-supporting; to provide such post secondary education, when possible, as part of the regular curriculum of the Exceptional Children's Program, or by means of special programs funded through various government agencies or other sources."

The latter type of post secondary activity offered by I.U.'s is exemplified by a program reported by the Delaware County I.U. as the "Delaware County Area Vocational-Technical Education Adult Evening Program". The reported program objectives were to "Provide training for entry level skills in specific occupations" and to "Provide advance or supplemental training or re-training in specific occupational areas." The Program was reported as staffed (on a part-time basis) by 49 I.U. employees and serving about 1,400 adult students in 65 evening classes during the school year. The program was reported as "self-sufficient in its operation", i.e., funded 100% by student fee payments.

t. Education of Children of Migrant Workers - This involves provision of education services to children who are temporary residents of the I.U. area due to the "harvesting" or "crop picking" work of their parents; whether or not an intermediate unit gets involved in this program area is generally dependent upon the local agricultural needs and usage of migrant laborers. In addition to delivery of education services, this program generally involves an outreach component, i.e., location and identification of children who should be enrolled in the classes. I.U. activities in this program area are financed by the state and federal governments.

57/ In addition of course to in-service training programs for teachers and other education professionals offered by virtually all I.U.'s.

58/ I.U.'s offering this latter service are generally those who are operating agents for an area vocational technical school.

u. Descriptions of Selected Individual I.U. Projects - The following pages (numbers 74 through 94) set forth descriptions of individual projects carried out by various intermediate units. Some of the projects described could be categorized into one of the "program areas" described on the preceding pages. The purpose in setting forth detailed descriptions of the selected projects is to give the reader a better understanding of specific activities carried on by the I.U.'s, both within the described "program areas" and in a few cases, perhaps outside of them.

The projects are all set forth in a common format including, (1) I.U. that carried out the project, (2) project title, (3) description or objective, (4) number of I.U. employees involved, (5) recipients of project service, (6) estimated program expenditures, and (7) source of funding. All information set forth pertains to the 1974-75 school year and was obtained from the respective intermediate units in reply to a questionnaire sent to them by the staff of the Legislative Budget and Finance Committee in June of 1975[59] or via interviews and printed information obtained directly from the I.U. or through PDE.

The project descriptions are presented by intermediate units listed sequentially by I.U. number (beginning with I.U. #3 and ending with I.U. #25). Not all I.U. projects submitted are described in this section, of course; rather, projects described here were especially chosen as examples to illustrate the range and variety of specific I.U. activities.

59/ A total of 27 of the 29 intermediate units submitted replies to the "program activities" questionnaire sent to them by the Committee's staff. Clarion Manor and Philadelphia I.U.'s did not reply, and, as a result, information set forth in this section does not take into account any particular projects operated by these two I.U.'s.

DESCRIPTION OF SELECTED PROJECTS OPERATED BY THE ALLEGHENY INTERMEDIATE UNIT (#3)

1. Project Title - World Cultures Curriculum Development for Secondary Schools

Description or Objective - Development of a set of teaching materials, including teacher manuals, student manuals, slides, tapes, transparencies, and resource guides, to be used in seventh and tenth grade world cultures classes that are intended to "promote research skills, critical thinking, and concept understanding on the part of the students."
Number of I.U. Employees - 2 part-time
Recipients of Service - 24 school districts including approximately 100 teachers and 8,500 students.
Estimated Program Expenditure - $45,000
Source of Funding - Service users

2. Project Title - Responsible Citizenship Project

Description or Objective - "By providing material and preparing teachers to facilitate classroom discussions of moral issues; and by collecting and comparing data concerning student...moral judgement...and... self-understanding, attitude towards school, and citizenship, the project will:
(a) Measure any difference between the high and low socio-economic areas,
(b) Measure any difference between teacher training conducted by workshop vs. teacher training by training manual."
Also, the project will attempt to validate the EQA (Educational Quality Assessment) instrument used by the PDE. Also, the project intends to assess the influence of "one particular teaching process" on the EQA tests.
Number of I.U. Employees - 1 full-time, 16 part-time
Recipients of Service - 24 classroom teachers in 11 different school districts and 1,223 students.
Estimated Program Expenditure - $48,343
Source of Funding - Federal Government

3. Project Title - FHA - Involvement Oriented Program

Description or Objective - "1. Make FHA [Future Homemakers of America] an integral part of the total Home Economics Program. 2. Develop an activity-oriented FHA project which will encourage student involvement in district chapters. 3. Build a firm foundation of interest and participation in FHA in the middle schools and in junior high schools. 4. Organize a county FHA.... 5.Develop a series of slide sound tapes which can be used as a part of the Home Economics Program."

ALLEGHENY INTERMEDIATE UNIT (#3), Continued

Number of I.U. Employees - 1 full-time, 1 part-time
Recipients of Service - 700 students, 125 teachers, 46 administrators
Estimated Program Expenditure - $19,718
Source of Funding - Federal Government

DESCRIPTION OF SELECTED PROJECTS OPERATED BY THE NORTHWEST TRI-COUNTY I.U. (#5)

1. Project Title - Applachian Educational Satellite Project

   Description or Objective - A space satellite has served as a vehicle for television reception of teacher in-service training programs conducted at the University of Kentucky; they have been able to receive these programs at the I.U. facility because they have their own space satellite "disc" which was aimed at a satellite "parked" in space. (The U.S. Government has "moved" the satellite to the western part of the U.S., out of range of the Tri-County I.U. disc, but the I.U. reports that the satellite will either be replaced by another satellite or be moved back into position so that programs can once again be received.)
   Number of I.U. Employees - 2 part-time
   Recipients of Service - 60 teachers during 1973-74
   Estimated Program Expenditure - $17,644
   Source of Funding - Local and Federal governments

2. Project Title - Career Education

   Description or Objective - Preparation and dissemination of occupational opportunities in such a format that teachers (K-12) may incorporate into their regular lessons on traditional subjects information about various occupations. For instance, a grade school teacher could incorporate for several days into her curriculum a module on transportation, journalism or banking with no increase in teaching time since this information would be incorporated into the subjects on math, reading, etc.
   Number of I.U. Employees - 4 full-time, 8 part-time
   Recipients of Service - 876 teachers, approximately 22,000 students
   Estimated Program Expenditure - $95,219
   Source of Funding - Federal Government

DESCRIPTION OF SELECTED PROJECT OPERATED BY THE WESTMORELAND I.U. (#7)

1. Project Title - Science Leadership, Title III, Project #72015

   Description or Objective - The Science Leadership Program is a state wide program that "...was designed to train a representative core of key secondary teachers who will assume active leadership role in conducting workshops and programs on research for teachers and students in local areas throughout the state."
   Number of I.U. Employees - 2 part-time
   Recipients of Service - 180 Classroom teachers of science across the Commonwealth
   Estimated Program Expenditure - $24,000
   Source of Funding - Federal Government

DESCRIPTION OF SELECTED PROJECTS OPERATED BY THE TUSCARORA I.U. (#11)

1. Project Title - Special Education Math Project

   Description or Objective - (1) Develop a Math Resource Guide to identify concepts and skills for teaching of math to educable mentally retarded children; (2) develop instruction materials to implement objective #1; (3) develop a master plan to build an effective instruction system for teaching math to educable mentally retarded children. (This project is operated from an office located in downtown Harrisburg.)
   Number of I.U. Employees - 2 full-time, 1 part-time (these employees also serve the project entitled "Guidance Counselor as a Curriculum Decision Maker" described below).
   Recipients of Service - Ultimately intended to serve educable mentally retarded children throughout Pennsylvania.
   Estimated Program Expenditure - $75,000 (includes expenditures for Guidance Counselor as a Curriculum Decision Maker project described below).
   Source of Funding - Federal Government

2. Project Title - Guidance Counselor as a Curriculum Decision Maker

   Description or Objective - This project is for students who may be having problems with math. The project will attempt to establish a set of procedures for diagnosing learning problems in math, prescribing remedial actions and evaluating results of prescriptive programs.
   Number of I.U. Employees - (see Special Education Math Project above)
   Recipients of Service - elementary students throughout Pennsylvania
   Estimated Program Expenditure - (included in Special Education Math Project above)
   Source of Funding - Federal Government

DESCRIPTION OF SELECTED PROJECTS OPERATED BY THE BERKS COUNTY I.U. (#14)

1. Project Title - Nolde Environmental Education Center

Description or Objective - Activities relate to environmental education and include involvement in formal educational settings (school classrooms e.g.), community (general public) involvement, educational/recreational activities, career decision making, and teacher training.
Number of I.U. Employees - 13 full-time, 8 part-time
Recipients of Service - 21,000 pupils, 2,500 teachers, 430 administrators, 11,000 of the general public
Estimated Program Expenditure - $50,000
Source of Funding - Federal Government

2. Project Title - SIMCA -(Supplemental Instructional Multi-media Curriculum Approach)

Description or Objective - Preparation and distribution to public and nonpublic schools of a "multi-media, multi-sensory learning package" for elementary students.
Number of I.U. Employees - 2 part-time
Recipients of Service - 25,000 students, 1,000 teachers
Estimated Program Expenditure - $28,275
Source of Funding - Federal and local

3. Project Title - Neighborhood Youth Corps

Description or Objective - "Provide work programs through which economically disadvantaged youth can earn money which makes it economically possible for them to stay in school."
Number of I.U. Employees - 2 part-time
Recipients of Service - 90 students
Estimated Program Expenditures - $60,000
Source of Funding - Federal Government

4. Project Title - Special Mobile Industrial Learning Environment (SMILE)

Description or Objective - This project is an amalgamation of vocational evaluation activity, driver education, and pre-vocational home economics. Objectives in vocational education are to identify the wants, needs and skills of students. Objectives in driver education are to expose the student to driver simulation, to train students to successfully operate an automobile, and to facilitate students getting to employment sites. Objectives in pre-vocational home economics are to provide the means to receive adequate pre-vocational home economics training.
Number of I.U. Employees - 6 full-time
Recipients of Service - 70 students in driver education, 111 in home economics, and 146 in evaluation.

Estimated Program Expenditure - $100,000
Source of Funding - State and local

5. Project Title - Living Exploratory Awareness Program (LEAP)

Description or Objective - The main objective of this proposal is to provide a means for handicapped students in Berks County who are less than 14 years of age to receive Living Exploratory Awareness training in conjunction with the new Mobile Elementary Career Education Guidance Unit; LEAP and this mobile unit together are to give these students "a realistic rationale as it pertains to a career objective".
Number of I.U. Employees - 3 part-time
Recipients of Service - Information not provided
Estimated Program Expenditure - $46,328
Source of Funding - Local and Federal

6. Project Title - Pennsylvania Training Model

Description or Objective - Identification of all persons working in education programs for the severely and profoundly mentally retarded and multi-handicapped children in the entire state and, further, to identify the "needs" of this group of people in the area of program development; also, to develop and implement a training program designed to meet these "needs". (Teachers from the eastern part of the state received training during 1974-75; the western part of the state is to receive training in the 1975-76 school year.)
Number of I.U. Employees - 2 full-time
Recipients of Service - All persons in the state who are actively involved in the educational program for severely and profoundly mentally retarded and multi-handicapped children.
Estimated Program Expenditure - $50,000
Source of Funding - Federal Government

DESCRIPTION OF SELECTED PROJECTS OPERATED BY THE CAPITAL AREA INTERMEDIATE UNIT (#15)

1. Project Title - Vocational Home Economics Education to Trainable Mentally Retarded Students

Description or Objective - To assist the students in gaining competencies which will lead to semi-independent living and enable them to play a more functional role in the family and community, to be more aware of the consumer's world and to teach skills that might lead to gainful employment.
Number of I.U. Employees - 1 full-time, 1 part-time
Recipients of Service - 98 mentally retarded students, 7 teachers, 7 teacher's aides
Estimated Program Expenditure - $21,000
Source of Funding - Federal Government

2. Project Title - Pennscript

Description or Objective - A project for the collecting and dissemination (through the media of microfilm) of vocational and occupational information which has been been "localized" for 18 areas throughout the Commonwealth. This project collects information and data on 260 common occupations and reduces each occupational description and data to a concise format which is printed on a microfilm card. The information on each card is "localized" to one of 18 labor market areas (geographical area) in Pennsylvania. (For example, the starting salary and pay scale and job prospects for a machinist may vary according to locale.) The 260 cards are organized into "Decks" and are shipped upon request to guidance counselors and others who may use the information by putting the microfilm card on a special "microfilm reading machine."
Number of I.U. Employees - 10 full-time
Recipients of Service - 855 schools throughout the Commonwealth; 1475 "PENN decks" have been sent out.
Estimated Program Expenditure - $150,833
Source of Funding - Federal Government (through the Bureau of Vocational Education of PDE)

3. Project Title - Comprehensive Guidance In-Service Center

Description or Objective - (1) To provide a demonstration center for model innovative activities in guidance, (2) to provide a facility for pre and in-service training with an emphasis on "hands on" experiences for counselors and teachers, (3) to provide an organized system of guidance information acquisition and dissemination, (4) to organize a comprehensive library of guidance resources and materials, and (5) to bring about a clearing house for ideas, issues,

and concerns relative to school guidance programs and the activities and services of the guidance and counseling sections of the Department of Education.
Number of I.U. Employees - 1 full-time, 2 part-time
Recipients of Service - 570 counselors, teachers administrators, and counselors-in-training.
Estimated Program Expenditure - $68,641
Source of Funding - Federal Government

4. Project Title - Pennsylvania Materials Center for the Visually Handicapped

Description or Objective - "To supply every visually handicapped student in Pennsylvania with textbooks, materials, and equipment needed for an education commensurate with their academic potential" and to sponsor in-service training for teachers of the visually handicapped.
Number of I.U. Employees - 6 full-time
Recipients of Service - All 152 teachers of the visually handicapped in Pennsylvania and the 1,757 students who are visually handicapped.
Estimated Program Expenditure - $114,000
Source of Funding - Federal Government

5. Project Title - Special Education Learning Resource Center

Description or Objective - "Pennsylvania established three Regional Resource Centers to serve Western, Central, and Eastern sections of the Commonwealth in the summer of 1968.* The Central Center administered by the Capital Area Intermediate Unit provides services for the thirty-four central counties. The major purpose of the center is to promote innovation in and enrichment of programs for handicapped children. The following services are provided to special education teachers and allied professionals: 1)Dissemination of information concerning materials, methods and new materials; 2) Collection, demonstration, trial loan, and assistance in evaluation of instructional materials both at the center and in the field; 3) Inservice training programs; 4)Consultation for program development. The Smilemobile, a large mobile unit equipped with the most recent electronic teaching devices, materials, and books, visits schools to give handicapped children and their teachers an opportunity to examine new materials and use the teaching machines. Two smaller Smilevans provide services to state schools and hospitals. Another service offered by the Central Center is the operation of the Pennsylvania Materials Center for the Visually Handicapped [described above].
Number of I.U. Employees - 11 full-time, 2 part-time.
Recipients of Service - handicapped students between the ages of 6 and 21 in the thirty-four central Pennsylvania counties.
Estimated Program Expenditure - $345,000
Source of Funding - Federal Government

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* The other two Centers are operated by Allegheny and Montgomery County I.U.s.

DESCRIPTION OF SELECTED PROJECTS OPERATED BY THE CENTRAL SUSQUEHANNA I.U (# 16)

1. Project Title - Neighborhood Youth Corps (Summer and Winter)

Description or Objectives - (1) Provide work experience for 1,000 needy youngsters (ages 14-21) in Columbia, Juniata, Mifflin, Montour, Northumberland, Snyder, and Union Counties, (2) Provide career education information to these students, and (3) Provide counseling to students.
Number of I.U. Employees - 1 full-time, 6 part-time
Recipients of Service - over 1,300 needy youngsters
Estimated Program Expenditures - $1,022,000
Source of Funding - Federal Government

2. Project Title - Project SPROUT

Description or objectives - Project SPROUT is an attempt to determine and provide what [high school] dropouts in Columbia County need to move toward suitable employment.
Number of I.U. Employees - 2 full-time, 3 part-time
Recipients of Service - 19 high school dropouts in Columbia County between the ages of 16-19
Estimated Program expenditure - $80,000
Source of Funding - Federal Government

3. Project Title - Regional Diagnostic/Instructional Reading Norms Project
Description or Objectives - The objectives of the RD/IRN Project are: (1) The development of a criterion-referenced, diagnostic reading test that would reflect Central Pennsylvania communication norms, and (2) the creation of instructional materials for remedial and developmental reading instruction. In addition, teachers are offered in-service courses designed to aid them in using project materials and employing a diagnostic model in reading instruction.
Number of I.U. Employees - 1
Recipients of Service - 8 teachers and approximately 200 students
Estimated program Expenditure - not reported
Source of Funding - Federal Government

4. Project Title - Governor's School for the Arts
Description or Objectives - The Governor's School for the Arts is a State wide project operated by I.U. 16 in conjunction with the Pennsylvania Department of Education. The core staff consists of 2 full-time employees, but for 6 weeks during the summer months, the staff is increased to include about 32 teachers and 30 aides. With the cooperation of all other intermediate units, children who have an exceptional talent in one of the fine arts are selected and granted $1,000 scholarships in order to attend this special summer school. The scholarship money is forwarded to I.U. 16 for operation of the school. A portion of the students are handicapped. For further discussion of this program, see page 42 of this report.

Number of I.U. Employees - 2 full-time, 62 part-time
Recipients of Service - 227 students (including 13 handicapped) in 1975
Estimated Program Expenditure - $239,000 from the Federal Government (A portion of this money, $214,000, is awarded to the individual I.U.'s by PDE; the I.U.'s award is in the form of scholarships to the students; and, the students pay it to I.U. #16 for operation of the school.).

5. Project Title - System for Information Retrieval of Educational Data (SIRED)

Description or Objective - This project was begun in 1972 in order to study the systematic acquisition and storage of data relative to the governance of the Commonwealth's 505 school districts and 29 intermediate units. Specifically, the study addressed the "form proliferation" from the Pennsylvania Department of Education and the development of an efficient data collection and retrieval mechanism that would serve the Department of Education, the intermediate units, and the school districts. A preliminary design for a state wide educational computer network has been developed, and currently work is progressing on the "form proliferation" problem of PDE. Central Susquehanna Intermediate Unit received federal funding through PDE to conduct this project on PDE's behalf. It was this study that formed the background for the 1975 recommendation to the State Board of Education for the establishment of an intermediate unit computer network throughout the Commonwealth. (The State Board did not adopt the proposal, but rather took other measures--see discussion on page 46 of this report.)
Recipients of Service - Department of Education and the public school system of the Commonwealth of Pennsylvania
Estimated Program Expenditure - $36,000 (total of $114,000 since the inception of the project)
Source of Funding - Federal funds via PDE

6. Project Title - Right to Education

Description or Objective - (1) to assure the provision of an appropriate education to all handicapped children (ages 0-21) in Pennsylvania, (2) to improve the system for locating and identifying handicapped children, (3) to refine appropriate laws and regulations as needed, (4) to assess the quality of educational programs for handicapped children throughout Pennsylvania. Further description of the PDE Right to Education Programs and the key role of Central Susquehanna Intermediate Unit (#16) as well as reliance on all other intermediate units is described on page 33 of this report.
Number of I.U. Employees - 10 full-time
Recipients of Service - over 200,000 handicapped children in Pennsylvania
Estimated Program Expenditure - $344,000
Source of Funding - Federal Government

DESCRIPTION OF SELECTED PROJECT OPERATED BY THE LUZERNE I.U. (# 18)

1. Project Title - Library Media Examination Center

Description or Objective - The Pennsylvania Department of Education in cooperation with the Luzerne Intermediate Unit board of education has established a library media examination center for the purpose of allowing classroom teachers, library/media specialists, and administrators in Northeast Pennsylvania concerned with the selection of materials and/or curriculum development to examine and evaluate the latest printed and non-printed curriculum related materials before purchasing such. This library examination center is one of five such centers established by PDE with federal monies; further description of the program is located on page 44 of this report.

Number of I.U. Employees: 3 full-time, 1 part-time

Recipients of Service: 12 school districts served by intermediate unit #18

Estimated Program Expenditure: $29,533

Source of Funding: Federal, for purchase of materials; state and local governments, for salaries and operational costs.

DESCRIPTION OF SELECTED PROJECT OPERATED BY THE BUCKS COUNTY I.U. (#22)

1. Project Title - Grand View Diploma Nursing Program

Description or Objective - This was described as a project "To demonstrate a career-ladder nursing program designed specifically to take a Licensed Practical Nurse to a Registered Nurse status in one year. The purpose of the program is to provide learning experiences which will increase the scope and depth of knowledge and add to the skills of the Licensed Practical Nurse so that she can qualify as a Registered Nurse and function as beginning practitioner in hospitals and other community health care institutions and agencies."

Number of I.U. Employees - 5 full-time

Recipients of Service - 22 Student Licensed Practical Nurses at the Grandview Hospital

Estimated Program Expenditure - $143,375

Source of Funding - Federal and local

DESCRIPTION OF SELECTED PROJECTS OPERATED BY THE MONTGOMERY COUNTY I.U. (# 23)

1. Project Title - National Learning Resource Center of Pennsylvania (NLRCP)

Description or Objective - The I.U. provided the following program description: "Staff are assigned in five technical assistance and demonstration units and in a central coordination and support unit. They are responsible for contacting special education personnel in intermediate units, demonstrating best practices relating to appraisal and programming procedures, monitoring and providing consultation to intermediate unit staff members, developing products which facilitate delivery of these services and providing summative and formative evaluation. The central unit staff members have the responsibility for coordinating dissemination, computation, resource information and evaluation services."

This program's main office (central unit) is located in King of Prussia (Montgomery County); its five additional offices (demonstration units) are located in Harrisburg, Gibsonia, Philadelphia, and State College. All centers are staffed with I.U. 23 employees except Philadelphia and State College where services are contracted with the local intermediate units. The project's objectives, as reported by the I.U., indicate that the program was apparently developed in conjunction with personnel of the PDE.
Number of I.U. Employees - 14 full-time plus contracted services
Recipients of Service - Direct services to 20 intermediate units and over 200 affiliated staff members; indirect services to 1,922 students "in a variety of classroom environments."
Estimated Program Expenditure - $225,000
Source of Funding - Federal Government

2. Project Title - Pennsylvania Accelerated School Success

Description or Objectives - The major objective is state-wide implementation and local operation of new habilitative procedures. Other objectives include direct services to 34,140 speech, fluency, or language handicapped school children; training and certification of 800 teachers to administer the programs; training and certification of teachers in each I.U. to train others so that they may become candidates for certification. All certified personnel are registered in the national directory and thus, are an integral part of the national network of certified persons qualified to administer specialized programs in language, fluency, and articulation. Among the activities described by the I.U. under the project were the provision of approximately 72 "intensive training workshops".
Number of I.U. Employees - Contractors (no regular I.U. personnel)
Recipients of Service - 34,140 speech, fluency and language handicapped public school children in the State of Pennsylvania

all of whom have reportedly been "trained in the fluency programs which have been developed and tested over the past five years."
Estimated Program Expenditure - $157,700
Source of Funding - Federal Government

3. Project Title - Project RISE (Research and Information Services for Education)

Description or Objective - The following were among the objectives submitted by the I.U.: (1) to maintain and expand a specialized professional resource intended to provide a research, development, planning, exemplary practice and human resource information base for the Commonwealth, (2) To develop and execute programs which will make it feasible for personnel of the education community to requisition information appropriate to their professional role from sources capable of providing that information adequately and in a timely fashion, (3) To continue efforts to establish and maintain a state-wide information network linking all appropriate educational agencies in free, two-way, flow of information. The following description was reported by the I.U. as project activities:

> "Requests for service are received by specially trained personnel in each participating I.U. or, in the case of Montgomery County I.U. requests, directly at R.I.S.E. Information Service personnel, known as literature searchers, then identify locate, and retrieve materials relevant to the requesters need. The major resources investigated by the searchers are the complete ERIC (Educational Resources Information Center) documents and mocrofiche, Psychological Abstracts, Exceptional Children Abstracts and several other excellent educational resources. Some 300 educational journal titles housed at R.I.S.E. are also searched for relevant information. A substantial book and document collection as well as the Montgomery County Intermediate Unit Professional Collection are available for requester needs. The supporting library and clerical staff aid the literature searchers in providing and maintaining resources and compiling and packaging the product for use by the client/educator. Management and policy decisions for services are provided by the administrative staff."

Number of I.U. Employees - 7 full-time, 26 part-time
Receipients of Service - 8,744 educators, including administrators, teachers, ancillary staff persons, PDE personnel, graduate students, school board members, and professional education agencies.
Estimated Program Expenditure - $420,000
Source of Funding - Federal, State and Intermediate Unit funds

4. Project Title - PRISE (Pennsylvania Research and Information Center for Special Education)

Description or Objective - "The project maintains in-depth special education information holdings in order to serve three Pennsylvania Special Education Regional Resources Centers which, in turn, disseminate information on special education to their respective areas. The project engages in information collection, retrieval, and dissemination...and acts as a clearinghouse of special education information services in Pennsylvania... "PRISE provides sophisticated in-depth literature searches and information retrieval for individuals engaged in: (1) new special education programs (2) the development and improvement of existing ones (3) federal project work, and (4) work for the Pennsylvania State Department [of Education]." The program is operated state-wide.
Number of I.U. Employees - 4 full-time, 3 part-time
Recipients of Services - All Pennsylvania educators of the Handicapped (described as "direct participants").
Estimated Program Expenditures - $115,000
Source of Funding - Federal

5. Project Title - SESIN (Special Education Student Information Network).

Description or Objective - The following descriptive information was submitted by I.U. #23:

> "During the 1974/75 academic year, the Special Education Student Information Network was charged with delivery of area-wide resource and information services to undergraduate and graduate students enrolled in five institutions of higher education. These services constitute one of the first attempts in the Commonwealth, and perhaps in the nation, to deliver a range of supplementary resources and information to special education teacher trainees. One unique component of the SESIN service delivery model is the local contact person on campus, and he initiates all requests for services. The needs of the student-clients can also be gauged more accurately as each representative provides input to the project on a regular basis. Thus, the student representative plays a key role in the delivery of services...project services can be broken down into four major areas: (1) Information Services, (2) Instructional Materials Workshop, (3) Instructional Materials/Media Circulation, (4) Dissemination.... The scope of the service includes not only course related research, but also encompasses information on scholarships in special education, on current trends in the field, [and] other training institutions around the country. SESIN shares the facility of the Eastern Pennsylvania Regional Resource Center (RRC) and the Pennsylvania Resource and Information Center for Special Education (PRISE)...."

Number of I.U. Employees - 3 full-time, 1 part-time
Recipients of Service - About 1,800 special education teachers in training at the following colleges: Millersville, Penn State, Bloomsburg, Holy Family and West Chester.
Estimated Program Expenditure - $57,240
Source of Funding - Federal Government

6. Project Title - Project KARE--Environmental Studies Project (Knowledgeable Action to Restore our Environment)

Description or Objective - Project KARE is a five-Intermediate Unit Project (Bucks, Chester, Delaware, Montgomery, Philadelphia); I.U. #23 is responsible for the administration and operation of the project. The prime objective reported for the project is to strengthen environmental studies as a curricular offering in constituent schools. I.U. #23 describes the following as project activities:

> "Project KARE staff serve mainly as change agents, responsible for providing consultant services to local schools. These services include site analyses, curriculum evaluation and design, in-service training, needs assessment, and facilities development. During 1974/75, a total of 16 Local Action Programs of environmental studies was conducted in selected schools. Additionally, over 200 on-site visitations were made to local schools to provide technical assistance."

Number of I.U. Employees - 6 full-time, 1 part-time
Recipients of Service - 21,000 students of 53 school districts within the 5 intermediate units.
Estimated Program Expenditure - $184,131
Source of Funding - Federal government

DESCRIPTION OF SELECTED PROJECTS OPERATED BY THE CHESTER COUNTY I.U. (#24)

1. Project Title - Spanish-English Second Language

Description or Objective - To "(a) help the participant develop basic English - second language skills in oral comprehension, oral expression, reading and writing. (b) prepare the participant for job interview situations and instruct them in completing application forms. (c) introduce participants to various county agencies which offer supportive services."
Number of I.U. Employees - 16 part-time
Recipients of Service - 130 adult Spanish speaking citizens
Estimated Program Expenditure - $38,000
Source of Funding - Federal Government

2. Project Title - Youth Employment Program

Description or Objective - The purpose of YEP is to provide work experience activities designed to enhance the future employability of youth (14-21) and to assist youth in maximizing their potential in obtaining a planned occupational goal.
Number of I.U. Employees - 5 full-time, 18 part-time
Recipients of Service - "900 students in I.U. service area (includes summer jobs for college youth)"
Estimated Program Expenditure - $680,000
Source of Funding - Federal Government

3. Project Title - Project 1776 - A Program in Early American Culture for Elementary School Pupils

Description or Objective - This is a project developed for appropriate educational experiences for pupils and teachers in preparation for the U.S. Bicentennial. Some of the reported objectives are: (a) to enrich the social studies curriculums in colonial history by re-creating, through sensory experiences, the mood and lifestyle that prevailed among the people at the time of our Country's beginning, (b) to develop an appreciation in children on the qualities that were needed to found the nation - resourcefulness, self-discipline, and a capacity for hard work, (c) to provide teachers, administrators and others with sources of information and ideas appropriate to Bicentennial programs and activities, (d) to improve the skills of teachers to develop appropriate school and community Bicentennial activities, and (e) to share workable ideas with educators throughout the Commonwealth.
Number of I.U. Employees - 2 full-time, 2 part-time
Recipients of Service - Over 1,600 teachers and approximately 48,000 children. Additionally, many copies of the Project

1776 Manual were distributed (via sale) outside of Pennsylvania (e.g., to Alaska, Hawaii, and the Netherlands).

Estimated Program Expenditures - $97,640

Source of Funding - "Program is funded by a grant from the State Bicentennial Commission, from funds contributed by Chester County Commissioners. from workshop fees charged participants, and from the sale of the Project 1776 Manuals."

DESCRIPTION OF SELECTED PROJECTS OPERATED BY THE DELAWARE COUNTY I.U. (#25)

1. Project Title - Mini-Grant Program From the Lebensburger Foundation

   Description or Objective - This project provides mini-grants to Delaware County high school students; the project objective is "To encourage students... to learn to identify community needs, to develop a program to meet said needs and to learn to evaluate the effectiveness of said program."
   Number of I.U. Employees - 1 part-time
   Recipients of Service - "11 high schools (students and teacher advisors) received grants totalling $3,385... thousands of students either participated or benefited from the program in some way."
   Estimated Program Expenditure - $6,000
   Source of Funding - 100% from the Lebensburger Foundation

2. Project Title - Close-Up Forum on the Involvement of Youth in Government

   Description or Objective - This project is intended "to encourage the involvement of high school youth in the function and operation of the Federal Government." The I.U. serves as liaison between the Delaware County School Districts and the Close-Up Foundation which provides a week-long experience for selected students (low income) with the three branches of government in Washington, D.C. The Close-Up Foundation provides 2 student and 1 teacher scholarship for each high school in Delaware County. Additional students participate in the program at their own expense.
   Number of I.U. Employees - 2 part-time
   Recipients of Service - 173 students and teachers from 28 Delaware County public and nonpublic high schools.
   Estimated Program Expenditure - $0 from I.U. monies
   Source of Funding - Close-Up Foundation (see above)

3. Project Title - Affective Education Center - Drug and Alcohol Education Services

   Description or Objective - The primary objective of the Affective Education Center is the training of teachers, counselors, administrators, parents, and students in the specific skills needed to help facilitate the positive physical and psychological growth of students, children, and peers. The project concerns itself with the problems of living, making decisions, solving problems, getting along with parents, teachers, and peers, and creating a better classroom and home environment as a necessary step in the positive development of the individual and the prevention of abuse of alcohol and other drugs.

Number of I.U. Employees - 3 full-time
Recipients of Service - 354 persons (representing all Delaware County school districts) including teachers, counselors, administrators, parents, and students received training in 13 various workshops during FY 1974-75. Additionally, over 3,000 people reportedly used the resources of the Center, which include films, filmstrips, tapes, programmed texts, slides, games, books, records, literature, and audio-visual equipment.
Estimated Program Expenditure - $30,000
Source of Funding - State and local governments

4. Project Title - Delaware County Intermediate Unit Right to Read Program

Description or Objective - To raise the reading levels of the Darby Township Elementary School pupils and to improve the Darby Township Elementary School reading program through in-service training. (This program was a part of PDE's statewide Right to Read effort that is intended to eradicate illiteracy. The key role of Capital Area Intermediate Unit as fiscal agent for the Departmental program as well as reliance on other intermediate units to deliver this program is described on page 39 of this report.)
Number of I.U. Employees - Not reported (apparently part-time activity)
Recipients of Service - Apparently Darby Township Schools
Estimated Program Expenditure - No I.U. expenditures reported for FY 1974-75
Source of Funding - State and local governments

4. Opinions of I.U. Executive Directors on Certain Issues

During the collection of information for this report a questionnaire was sent to all intermediate unit executive directors. The questionnaires requested a wide range of information from the I.U.s, much of which is set forth in other portions of this report; in addition to factual information, the questionnaire also requested the "opinions" of the I.U. directors on three key issues (namely, financing of I.U.'s; possible duplication of services among school districts, I.U.'s and the Pa. Department of Education; and whether the I.U. is a "locally" or "State" controlled organization) and solicited any general "comments" which the I.U. executive directors might care to offer.

The questionnaires were completed and returned to our staff by 28 of the 29 intermediate units (Clarion Manor I.U. did not reply); set forth in this section of the report are the opinions of the executive directors on the issues mentioned above, including examples of submitted comments directly pertinent to each of the issues, and selected comments of a general nature submitted by the I.U. directors.

a. Question asked - Is there a "duplication of service among the staffs of the Department of Education, local school districts and the intermediate units?

(1) 21 I.U. executive directors (75% of the respondents) indicated no duplication of service;
(2) 6 I.U. executive directors (21%) indicated a belief that there is duplication of service;
(3) 1 respondent did not answer the question;
(4) Examples of comments submitted by executive directors who answered no duplication are as follows:

* A "duplication" of services among the staffs of the Department of Education, local school districts, and the intermediate unit can be avoided if careful thought is given to the question of "which agency is now providing the service" and/or "which agency can provide the requested Service with the greatest economy and quality". [Our] staff, has provided a service to School Districts on a number of occasions simply by acting as a facilitator in getting the local school district to an already existing service in either the Department of Education or other agency.

* In some instances, there may be a minor duplication of services, but for the most part, IU and PDE roles are reasonably well defined.

* In our opinion, there is no real duplication of services among the staffs of the Department of Education, local school districts, and intermediate units. As we perceive the system, the three act more or less independently, although there are occasionally intersecting spheres among the three. Local school districts are responsible for the day-to-day control of education, including the development of school district budgets, hiring of staff--especially the most important staff in the education system, those

who work directly with children--and the development of the basic educational programs provided for children in the Commonwealth. The State Department has as its primary role being guarantor of the Constitutional requirement that the state provide a system of free public education. This function contains both regulatory and leadership aspects, but does not ordinarily infringe upon the prerogatives of either local school districts or intermediate units when those two entities are acting in accordance with law and regulations. The role of the intermediate unit is, admittedly, somewhat more nebulous. As we see that role, it is to provide services to local school districts, especially those services which local school districts would not be able to provide economically on an individual basis. It is the role of the intermediate unit to respond flexibly to the changing needs of local school districts--often those needs which are only first emerging. This gives the intermediate unit an opportunity to innovate and to lead, in ways that the State Department (a somewhat more entrenched bureaucracy) cannot manage. It would be simplistic to contend that these three different types of education agencies are separated from one another as layers in a layer cake (an analogy all too often suggested). Rather, they are, properly, we believe, engaged in a common enterprise (Morton Grodzins prefers the analogy of a marble cake) to provide the best possible education for the children of the Commonwealth. It is essential, we believe, to see a very important difference between "duplication" and "intersection."

- - - - (5) Examples of comments submitted by executive directors who believe that there is duplication of services are as follows:

* One may not express concern about a "duplication" of service among the staffs of the Department of Education, local school districts and the intermediate units, but the concern might be expressed relative to more clarification to determine which entity shall provide such services as: adult basic education; bi-lingual education; training and in-service instruction of school bus operators; administration of Youth Traffic Safety Councils; Student Council Forums; certain program areas of the special education services; and others. The guidelines are not specific. Some assignments given to Intermediate Unit staff by certain State Agencies involve staff time for which adequate financial support may not be available. The areas of assignment and responsibility should be more clearly indentified, and adequate appropriation of funds should be given the intermediate units to carry out these assignments.

* At the present time, it appears that there are from time to time services which are duplicated on all three levels. In some cases this is as it should be. However, there appear to be some duplication of administrative services which can provide increased cost effectiveness where lines of need are clearly defined. I am

referring to such areas as in-service and continuing education, joint purchasing, school transportation, data processing services, etc. I must point out that some I.U.'s are solving many of these problems in cooperation with the local school district.

* The Pittsburgh School District performs the same service as the I.U.; example, hiring of personnel, financial management, purchasing. We recommend that the School District receive all the rights and privileges of the I.U. without remaining a separate entity.

* In-service training of teachers, aides, bus drivers, maintenance personnel - I.U. should provide the service. Federal Programs should not be on a competitive basis between local districts and Intermediate Units. The various programs should be allotted to the districts or the intermediate unit, depending upon the program. Special Education should be provided by intermediate units. Area Vocational-Technical Schools, when involving more than one school district, should be the responsibility of intermediate units.

* A local district may operate special classes or have them operated by the intermediate unit. State regulations provide for this choice because there is not evidence to indicate that one way is better than the other. It is a matter of preference but this "duplication" does not result in greater cost.

* In my opinion, there is very little duplication of services between the intermediate unit and the Department of Education, but there is some duplication of services between local districts and intermediate units. In my opinion data processing, which is a high cost service, is one service that no district, with the exception of Pittsburgh and Philadelphia, should be attempting to provide for itself. This is one service which should be operated by our intermediate unit, but at the present time is being provided for individually by most of the districts...I am confident that considerable number of dollars could be saved if all our districts and our intermediate unit joined forces for data processing services. There are a number of intermediate units in the United States and County Superintendent of Schools Offices where data processing services are being provided on a regional basis...Other services which local districts and intermediate units need not duplicate are in-service education and the employment of curriculum and subject area specialists. Another area which would provide an excellent opportunity for regionalization is in the field of negotiations. As school districts individually add specialized services independently of each other, the actual instruction expense per pupil increases and this results in pressure upon the General Assembly to provide additional reimbursement. The Legislature could have an effect on the actual instruction expense per pupil by eliminating from the calculation of the A.I.E. the cost of certain specified specialized services in districts with less than a certain number of pupils, perhaps 30,000 pupils. The Commonwealth could encourage districts to provide specialized services by providing some financial incentive if offered on a regional basis. The matter

is not one of I.U. expansion but, rather, how can we as 12 districts provide services in the most efficient, effective and economical way.... If districts begin using the cooperative approach for providing costly and highly specialized services, we can do much towards preserving local control - providing better education for our communities at a cost the taxpayers can support.

D. Question asked - Do you see the intermediate unit as basically a "locally" or "State" controlled organization?

(1) 22 (79%) of the responding I.U. executive directors indicated that I.U.'s are locally controlled;
(2) 1 respondent indicated that I.U.'s are State controlled;
(3) 4 respondents indicated that I.U.'s are both local and State controlled; and
(4) 1 responding executive director did not answer the question.
- - - - (5) Examples of comments submitted by executive directors who believe that I.U.'s are locally controlled are as follows:

* The control over daily operations, policy making and program development vested in the Intermediate Unit Board of Education and Advisory Council provides for basically local control.

* The possibilities for educational change and improvement are increased if people who implement a program have also assisted in its development. Intermediate units are in the best position to bring about this involvement if they act as agents of local districts rather than agents of the state.

* Intermediate units were created to be a service agency for local school districts. The administrative and advisory structure, together with the budgetary approval procedures contained in the law, insure that this occurs. I.U.'s must continue to be closely allied with the local school districts that they serve. Direction for programs and services to be offered by I.U.'s must come out of the needs of the local districts within the unit.

* It is, of course, recognized that public education is a creature of the State and that the State does have the major responsibility for the development of the total educational system for the Commonwealth. It is further recognized that in carrying out this function, the State must impose some controls and give some direction to all educational agencies, I.U.'s and local districts. This direction and the required regulations need not, however, make I.U.'s the servant of the State Department of Education or, for that matter, of any Department of State Government. The actual control of the I.U. must remain with the local districts that it serves.

* I.U. #5 is a locally controlled organization. All programs and services are under continuous review by the local districts. Each service is tailored to meet the individual district needs. While

I.U. #5 does operate in a leadership capacity, the leading is nondirective with no funds or time expended without the consent of the districts involved. Those services which can be done economically, efficiently and effectively are done by Intermediate Unit #5. Those services which the districts can do just as economically and efficiently are best left to the district to operate. The member school boards elected by the people in conjunction with the Intermediate Unit Board elected from those boards are the best judges of the services rendered....

* It should be neither wholly locally nor state controlled.

The services and programs we provide are largely dictated by our constituent districts. The State may decide upon appropriate areas for intermediate unit involvement, but our local districts decide upon the fact of actual provision....

* It must be a locally controlled organization. However, it must also be responsive to the needs of the Department of Education and the State Board of Education.

* The convention of school directors of all school districts of the intermediate unit elect the I.U. Board; approve the General Operation Budget and Program Budgets; and adopts the program of services. The intermediate unit board, elected by the convention of school directors, elects the executive director and all professional and non-certificated personnel; approves the special education budgets and other budgets for the federally-funded projects; adopts board policies and guidelines; administers all programs operated by the intermediate unit; and performs all other duties assigned to school districts by the School Laws of the Commonwealth of Pennsylvania. For the reasons stated above, the intermediate unit is basically a locally controlled organization.

* The intermediate unit is accountable to the local school districts through the Intermediate Unit Board and the School Superintendent's Advisory Council.

* In my opinion the intermediate unit is as locally controlled an organization as is an individual school district.

* Intermediate units can better serve local districts and even the Department of Education if they are controlled locally and have the option to accept or reject nonmandated activities.

* We see the intermediate unit operating primarily as a locally-controlled organization. We owe our first allegiance to the local school districts whose students and staffs we serve. The board of directors which established intermediate unit policy is, properly, comprised of members of local district boards of school directors. The needs assessment undertaken by our staff during the first two years of our operation (and updated informally ever since - see

SAC study-committee commentary re: questions 2-3 and 6) was designed to elicit, substantiate, and detail local needs. It was these local needs which we have endeavored to meet through the program of services offered by this intermediate unit since its inception. We see ourselves as an arm of the state only in such rare cases as providing management assistance following the devastation of Hurricane Agnes three years ago.

* Very emphatically, it is locally controlled. Anyone contriving to create a different idea is misinformed or uninformed.

* While this question has been answered, that we consider the intermediate unit as a locally controlled organization, it must be noted that, as with any school organization, the limits of control and authority are sharply defined by legislative mandate and by law, and any organization must operated within those bounds. It is also to be recognized that a portion of the funding is based upon state funds, which also implies a measure of state control. However, in theory and in practice, the services and programs offered by the intermediate unit, with certain exceptions, are those programs and services desired and funded at the local level. Since the level of State funding has been frozen since the inception of the intermediate unit, any expansions of services or any additional services and programs had to be funded in their entirety by the local districts. Unless such programs were effective and met the needs of the districts, they would not have been funded. Therefore, within the legal limitations as described above at the State level, the intermediate unit is seen as a locally controlled body for operational purposes.

* Although local superintendents do provide us with advice regarding services and programs, much of our time is devoted to providing workshops and seminars to implement State Board of Education regulations and standards of the Pennsylvania Department of Education.

- - - - (6) Examples of comments submitted by executive directors who believe that I.U.'s are both State and locally controlled are as follows:

* Policy - Local; financial - State.

* I think the concept in the intermediate unit law as presently written provides for the I.U. to be controlled locally on many issues and by the state on other issues. I believe this concept in this law to be valid. To make the I.U. fully controlled locally or fully controlled by the State would seriously restrict its potential.

* The intermediate unit is locally controlled with a mandate from the state to provide programs and services. In some measure the state controls the intermediate unit from the standpoint of financial aid.

- Intermediate units in Pennsylvania and across the country are truly organizations "in the middle". In my opinion, this fact of life is inescapable. We are primarily service organizations to our local district consumers and yet, at the same time, must react to state directives and goals. This is as it should be. It is a fine line to walk, but one which can be handled in an appropriate manner. On a more practical basis, the prime funding sources for I.U.'s are the state and local districts, hence, the obvious necessity to serve both.

- Intermediate units in Pennsylvania are mandated by the Legislation-all districts must be part of an intermediate units. This mandate is State control, however, the number of different programs and services of the intermediate unit and their effectiveness are determined largely by the local districts comprising the intermediate unit, thus the real effectiveness of any intermediate unit under present legislation depends upon the local districts - local control. It is interesting to note that in the legislation, Special Education is a mandated program and by regulation only those Instructional Materials Centers operated by intermediate units will be officially approved by the Department. By and large, this has worked to a great advantage even though mandated by either the Legislature or the State Board. In a majority of the intermediate units, both of these programs are prospering and are effective and efficient services. Both generally are funded adequately; this is not always true for the other services. From time to time, the Department has requested intermediate units to perform certain functions, such as the Student Forum. This can be interpreted as State control. In the matter of budget approval, which is a very complicated procedure, local districts exert the ultimate in control. Intermediate units have been created by the State so, from time to time, the Legislature or the State Department of Education do request or require intermediate units to perform particular services or conduct certain programs. This may be construed as State control, but local districts, also creations of the State, find themselves in the same situation when the Legislature or the Department of Education request local districts to carry out certain activities, or to provide certain programs. I believe the State must retain this prerogative. In my opinion, there are too many districts attempting to provide too wide a diversity of program specialists and sophisticated services for themselves. Furthermore, with the intermediate unit, and with the local district superintendents as the Professional Advisory Council, intermediate units are basically locally controlled. I should like to add that while this may be cumbersome and difficult at times, I also believe this is the best way for us to develop intermediate unit programs and services. If legislation could be enacted, providing for the selection by the member district boards for a representative other than a local school board member to serve on the Intermediate Unit Board, it would give the intermediate unit staff more opportunity to meet with the Intermediate Unit Board. Under the present situation, because local boards meet frequently and with board members serving on local committees, it is very difficult to arrange for more than one meeting of the intermediate unit board in any one month. Intermediate unit board members do not have sufficient time and opportunity to become well acquainted with intermediate unit activities. This proposal to select intermediate board members could be a similar procedure that boards use in selecting municipal authorities for the purpose of building schools.

c. Question asked - Are changes required in the current system for state funding of intermediate units?

(1) 27 (96%) of the responding executive directors indicated "yes", changes are required;
(2) 1 of the respondents indicated "no", changes are not required;
(3) Examples of pertinent comments submitted by I.U. executive directors are as follows:

* The provisions of law as outlined in Section 917A of the Public School Code of 1949 amended which provide for a guaranteed state contribution equal to the "amount received during the 1968-69 school year by the offices of the County Superintendents of Schools replaced by the intermediate unit" needs to be revised to provide for a guarantee from the state that is more equitable with the present expenditure levels of intermediate units and current economic conditions.

* It appears that the I.U. #2 office duplicates many functions that are already performed by the Pittsburgh School District. The school district could well be funded as an I.U. and reap any additional benefits that come to the I.U. We recommend that the Pittsburgh School District become one and the same entity with the I.U., having all the rights and privileges of the I.U.

* Sound funding practices for intermediate units would: (a) keep a reasonable balance between state and local funds (Ideal - 50% State, 50% Local) to support the basic intermediate unit program; (b) incentives for intermediate units to provide needed services which are encouraged by the state; (c) a basic state subsidy based on a percentage of the general operating subsidy for all public schools; (d) the full funding of programs mandated by the state.

* The present dependence on an "uncalculable" amount of State support for I.U.'s poses a problem for I.U.'s and must also be a concern for the General Assembly. There should be a relatively simple formula, i.e., .4 of 1 percent of the amount spent for Basic Education. The pegging of reimbursement to 1968-69 cost of operation of the county office is unrealistic.

* In spite of the fact that costs have risen greatly during the past four years, most intermediate units receive the same amount of subsidy which they received four years ago. Legislation should be passed which will automatically increase or decrease subsidies to

intermediate units. The executive directors are developing such a proposal.

* The present procedure for funding intermediate units calls for dividing an amount in the Governor's budget among the intermediate units. This amount is not based upon any formula and is never known until after the budget is passed, which makes intermediate unit planning very uncertain. We would suggest that legislation set-up a subsidy formula for intermediate units, which would give them a sure basis for planning. Our best estimates place that funding at .005 of the cost of education in the school districts.

* I.U. programs are for the most part expanding due to more specialized services being requested. These requests come from local school districts, PDE, various local government agencies and are becoming more numerous annually due to court opinions, citizens groups, minority pressures, new educational programs, student rights, etc. A better funding method is necessary if these expanding services are to continue in the future. Just as local districts require periodic increases in reimbursement, so should I.U.'s.

* Funding should be a certain percent of the member school district's state funding.

* Some provision should be provided for stable funding of services requested by PDE. Some provision should be made to provide for increased costs for services and management personnel.

* The programs of services to school districts by intermediate units could be expanded and improved if the annual funding might be proportioned according to a percentage formula geared to the current state subsidy distribution to the school districts within the service area of each intermediate unit. The present system of funding causes the I.U. to experience degrees of uncertainty as to the amount of funds that may become available on a year-to-year basis. This uncertainty prevents the intermediate unit from developing adequate long range planning of its services and programs.

* A formula must be established to determine a funding base and process so I.U. planning can take place. Currently, with funding through the Governor's budget, we have no idea of the amount of our allocation until the new year is upon us. This does not lend itself to continuity of programs nor to long range planning.

* The current funding procedure for I.U.'s is completely inadequate as to process, procedure, and funding. It is inconceivable to me that a law would provide funds to intermediate units in accordance with what a governor would state in his budget. There needs to be developed a specific formula which will establish a procedure for adequate funding for intermediate units. I suggest that S.B. No. 958 P.N. 1109 recently introduced into the current legislature will provide a means to this end.

* The total State allocation for intermediate units should be based upon a percentage of the State's Actual Instruction Expenses based upon the latest data available to the Secretary of Education. The pro-ration of the total State allocation to the individual intermediate units should continue by the formula currently contained in the School Code.

* There are two areas in which changes in the system of funding intermediate units are crucial. The first is in the area of the general operating subsidy - a subsidy based upon state payments to county superintendents in 1968-69. There are two obvious reasons for a need to increase this basic operating subsidy: (1) Inflation since 1968-69 has substantially eroded the buying power of education dollars and (2) the services provided by intermediate units have increased several-fold over those provided by the county offices, and it is reasonable to assume that the cost of these multiplied services would be subsequently increased. In addition, the expansion of the Right-to-Education to all exceptionalities will greatly increase the cost of providing special education services to the children of the Commonwealth. It is therefore crucial that the budget for special education also be increased.

* The annual state appropriation remains unchanged from 1971-72, which was based on the 1968 cost of operation of county offices. This is totally unrealistic in terms of inflation and increasing demands on the intermediate unit. A change in the law should be effected that somehow reflects rising costs of operation and/or inflation, such as a formula tied to school district's annual actual instructional expense.

* District contributions should be replaced by state contributions for all programs except management services.

* Where the law creating intermediate units promised a "minimum guaranteed payment" from the state, it should be just that and not have this support subject to annual budget manipulations. The minimum guarantee was based on the actual cost to the Commonwealth and the County Commissioners for support of the county school offices in 1968-69. If the Commonwealth wished to maintain this level of support, the appropriation should be increased by the inflationary factor from 1968-69 to the present. It is hardly reasonable for any organization to have revenues increased by inflation but have expenditures unaffected.

* Present state funding system is "static." We have received the same amount of money each year since the inception of the program despite inflation. Some system tied to "per pupil served" or "instructional costs" should be devised. Another option would be to provide taxing power to the I.U. Boards.

* Intermediate unit budgets must be adopted in March and April - no later according to law. Subsidy anticipation must be based on the

Governor's budget. The Governor's budget is seldom adopted as presented. The Legislature does not complete its action on the budget until June or later - several months after the final adoption of all intermediate unit budgets. The uncertainties inherent in this system are obvious and serious. We propose a change in procedure which gives a greater degree of predictability on subsidy. Legislation has been prepared to help solve this problem.

* Suggested formula for funding: Basic instruction subsidy x 1% x W.A.D.M. x I.U. aid ratio.

* Would recommend that an amount not less than five tenths of one percentum (0.5%) of the actual instruction expenses of all school districts in the Commonwealth be used in funding the operation of the intermediate units' programs of basic services.

* If the intermediate unit is to be a strong partner and leader in the education of the children of the Commonwealth, then the method of funding must be changed, if only to keep up with the increasing annual costs. Since the intermediate unit funding is so insignificant in the total educational budget, the vast majority of members of the [General] Assembly have not the time to delve into its seriousness. The [General] Assembly must rely on its Education and Appropriation Committees and their administrative staffs to provide the strong leadership necessary to determine the extent of fiscal support for the intermediate units. While we have naively accepted the concept that districts wishing services should be expected to pay for the same, the real truth remains that the local districts are unwilling to spend more for anything "out there", while they face overwhelming problems in harnessing their own budgets and tax structures. The annual deductions for intermediate unit special education classes, intermediate unit transportation, AVT schools, special schools, intermediate units, community college, public library, etc., etc., force school directors and administrators to focus in on expenditures "out there" or out of the district. A typical district of about 5,000 pupils in our intermediate unit has a deduction of $94,000 for intermediate unit special education services, plus $10,000 for the intermediate unit budget, $90,000 for community college $12,000 for recreation, and $3,000 for the public library. That's a whopping total of $209,000. In that district, this represents over 8 mills' effort on A.V.! Of course, we glibly respond, "These are your programs and your children." But they have the local tax fight - not us! All of these expenditures then are easily seen, and are even believed as being "away from home". Of course, it becomes our leadership role to lead the districts and their administrators to a reasonable level of intermediate unit commitment. I believe the large majority have become committed. When an intermediate unit, serving several or more counties and from 15 to 50 plus districts, the task is formidable and financial resources are essential. But when we see state intermediate unit resources frozen and local costs increased each year, then can we blame the resistance of local boards and administrators...

Unless state sharing improves, the intermediate unit may well become a frozen service. In that event, it will be increasingly difficult, and, in some instances, impossible to attract high quality intermediate unit leadership.

* A sound financial basis for providing quality services is an absolute necessity. Since local school districts support and state reimbursement are the only two sources of funds, a new method is needed for calculating the state share. We support a formula for state support which is tied with the state appropriations to local school districts.

* The present system for distributing the operating subsidy to intermediate units is irrational and inequitable. Using an intermediate unit-wide aid ratio for the distribution formula, does not allow the money to be allocated where the students and needs exist. Because the I.U. has no taxing power, the aid ratio is meaningless. In addition, I would think that the amount of operating subsidy should be established as a percentage of the state aid to local districts, as opposed to a separate line item in the state budget. The special education funding procedure is also in need of review. A good example of this need will become increasingly evident next year. The State Board of Education has expanded the "Right-to-Education" concept to all handicapped children, effective next fall. On a state-wide basis, the cost will be tremendous. At the same time, the Governor's proposed budget allowed for only a ten percent increase in funding. Obviously, this increase only allows for the continuation of existing programs, with little or no expansion. In other words, we again have a state mandate with no funding.

d. In addition to comments specifically related to the above stated issues, I.U. executive directors were invited to submit any other comments which they desired: the following are selected comments so submitted:

* This type of questionnaire, while it may prove fruitful to the legislature, in no way measures the importance of a regional educational service agency. A logical start for such an evaluation would be by measuring the services offered by school districts to their pupils. The following schema could be more appropriate: (1) list and categorize the various programs conducted by local school district operation; (2) evaluate to check that these programs are conducted economically, efficiently and effectively; (3) where shortcomings exist, evaluate the feasibility of a regional agency providing such a service; (4) evaluate the regional as opposed to the local programs; (5) evaluate all regional programs to estimate which of these should be local; (6) evaluate those programs transferred from regional to local for comparison; (7) conduct ongoing assessments as to which operations belong where. In summary, the real question is not whether we should have I.U.'s or not. The question is what should

the regional agency do and what should the local agency do to provide the best education available for a finite dollar.

- * We perceive that this survey questions the program and service variability from intermediate unit to intermediate unit. We would want to be on record as supporting the notion that program variety among intermediate units is a positive result, that each intermediate unit should be constrained by the desires of its constituent school districts. It seems to us there exists no reason to assume that Philadelphia area school districts would desire the absolute same programs and services as Westmoreland school districts.

- * Questionnaire is vague, poorly prepared, statistically invalid by virtue of its statements. Most of the information requested could have been obtained from Dr. Piatts' survey.

- * There is confusion in the mind of the respondent because no distinction is made between the budgets for the intermediate unit operations (administration + services) and the special education budget. The latter is a separate budget operating under the Department of Education guidelines with no direct contributions from local school districts. Furthermore, our board can delete programs under our "Operations" budget but cannot delete programs under the special education budget.

C. School District Commentary on The Intermediate Units

In order to obtain information and opinions from school districts about their interaction with the intermediate units, questionnaires were sent by the staff of this Committee in the summer of 1975 to a large sampling of school district superintendents and to presidents of school district school boards.

The information obtained from these individuals is summarized in this section of the report.[60] In the interest of objectivity, the data is set forth in parts 1 and 2 of this section generally without interpretation and with many direct quotations from the superintendents and school board presidents. The commentary received from these sources does lead one, however, to certain general observations regarding school districts interaction with the intermediate units; these observations are set forth in part 3 of this section, beginning on page 136.

1. Report of Information Obtained From School District Superintendents

A seven page questionnaire was used to query a sampling of the superintendents about their school districts' relationship with their respective intermediate units. The following is a synopsis of the information obtained.

a. Questionnaire Sampling Information:

(1)	Total school districts in the Commonwealth......	505
(2)	Number of superintendents sampled..............	178
(3)	% of total school district superintendents sampled	35%
(4)	Number of questionnaires returned..............	136
(5)	% of sampled superintendents that returned questionnaires..................................	76%
(6)	% of total number of school district superintendents responding.....................	27%

b. The following is a list of education services (excluding special education - see d below) and the percentage of responding superintendents who indicated that the service is received by his school district from an intermediate unit; the list is set forth in descending order, according to percentage of districts that receive the service:

	(Non-Special Education) Service	% Who Received From I. U.
(1)	Instructional materials services	94%
(2)	Continuing professional education.................	71%
(3)	Curriculum development...........................	70%
(4)	State and federal agency liaison.................	67%

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[60] Blank copies of the questionnaires used to gather this data and information on the "sampling group" of district superintendents are available upon request to the executive director of this Committee.

	(Non-Special Education) Service	% Who Received From I.U.
(5)	Financial management and long range planning	60%
(6)	Educational planning services	56%
(7)	Bulk purchasing	48%
(8)	Pupil personnel services	40%
(9)	Fine Arts program	34%
(10)	Data processing	33%
(11)	Vocational education services	29%
(12)	Mini-grants for teachers	29%
(13)	Research projects	29%
(14)	Union negotiations assistance	25%
(15)	Remedial education programs	11%
(16)	Training teacher aides and tutors	11%
(17)	Pre-school education programs	10%
(18)	Educational broadcasing services	7%
(19)	Food service	6%
(20)	Summer recreation or education program	6%
(21)	Tax collection services	3%

c. The following is a list of education services (excluding special education - see d below) and the percentage of responding superintendents who indicated that this is an important service to his school district; the list is set forth in descending order, according to percentage of superintendents that consider it important:

	(Non-Special Education) Service	% Who Consider Important
(1)	Instructional materials services (films, etc.)	87%
(2)	Curriculum development services	71%
(3)	Financial management and long range planning	70%
(4)	State and federal agency liaison services	64%
(5)	Continuing professional education services	60%
(6)	Educational planning services	55%
(7)	Pupil personnel services	48%
(8)	Bulk purchasing of materials	48%
(9)	Union negotiations assistance	43%
(10)	Data processing	43%
(11)	Vocational education services	41%
(12)	Research projects	37%
(13)	Fine Arts program	32%
(14)	Mini-grant program for teachers or administrators	30%
(15)	Remedial education programs	20%
(16)	Training of teacher aides and tutors	16%
(17)	Education program for pre-school children	15%
(18)	Food service programs	14%
(19)	Educational broadcasting	13%
(20)	Tax collection services	10%
(21)	Summer recreation or education programs	10%

d. The following is a list of special education services and the percentage of responding superintendents who indicated that the service is received by his school district from an intermediate unit; the list is set forth in descending order, according to percentage of districts that receive the service:

	Special Education Service	% Who Received Service
(1)	Education of trainable mentally retarded children.	85%
(2)	Services to speech or language impaired children..	85%
(3)	Psychological services and testing of pupils	83%
(4)	Education of physically handicapped children	81%
(5)	Education of the hearing impaired children	81%
(6)	Education of socially and emotionally disturbed children	80%
(7)	Education of visually handicapped children	79%
(8)	Education of brain injured children	79%
(9)	Education of severely and profoundly mentally retarded children	71%
(10)	Education of educable mentally retarded children..	67%
(11)	Special education learning resource center services	55%
(12)	Education for gifted or talented children	50%
(13)	In-Home instruction of handicapped	35%

e. The following is a list of special education services and the percentage of responding superintendents who indicated that this is an important service to his school district; this list is set forth in descending order, according to percentage of superintendents that consider it important:

	Special Education Service	% Who Consider Important
(1)	Education of trainable mentally retarded	87%
(2)	Education of hearing impaired children	85%
(3)	Education of socially and emotionally disturbed children	84%
(4)	Services to speech and/or language impaired children	82%
(5)	Education of physically handicapped children	81%
(6)	Education of brain injured children	81%
(7)	Psychological services and testing of pupils	79%
(8)	Education of visually handicapped children	78%
(9)	Education of severely and profoundly mentally retarded	73%
(10)	Education of educable mentally retarded children	69%
(11)	Education of gifted and/or exceptionally talented children	60%
(12)	Special education learning resource center	52%
(13)	Instruction in the home for multiple handicapped or other exceptional children	48%

f. Chart J on page 112 displays additional comparative information on superintendents' views related to the "importance" of certain education services other than special education offered by intermediate units; some key inferences that can be drawn from this Chart include:

(1) 41% of superintendents whose districts receive a Fine Arts Program service from their I.U. do not consider it an important service;
(2) Nearly 1 of every 3 superintendents whose districts receive "continuing professional education" and "mini-grants for teachers" services from their I.U.'s do not look upon them as important I.U. services;
(3) Every reporting superintendent who believes that instructional materials services is an important service receives that service from his intermediate unit;
(4) About 1 of every 4 reporting superintendents believes "union negotiations assistance" would be an important addition to his I.U.'s service program. Other important I.U. service additions in the opinion of many superintendents would be more curriculum development and data processing services.

g. Each superintendent was asked to list the three services which his district receives from his I.U. which he believes to be "most important" to his district; a total of 400 items were so listed; the items listed most frequently were as follows:

(1) 38% (153 responses) of all items listed was "special education" (or a particular type of special education);
(2) 27% (108 responses) of all items listed was the instructional materials service center (film library etc.);
(3) 8% (33 responses) of all items listed was curriculum services;
(4) 7% (30 responses) of all items listed were management services (including especially data processing and bulk purchasing);
(5) 6% (23 responses) of all items listed was inservice education (both for professionals and non professionals); and
(6) 3% (12 responses) of all items listed was local liaison and centralized information assistance (including especially bringing superintendents together to exchange ideas and serving as a general education information center).

h. Each superintendent was asked to list services not now available which he feels should be added to his I.U.'s service program; a total of 163 such items were listed; these items can be summarized as follows:

(1) 37% (61 responses) of all items listed can be considered management services (the three most frequently listed specific items were union negotiations assistance, computer services and bulk purchasing);
(2) 16% (26 responses) of all items listed can be

CHART J

OPINIONS OF SCHOOL DISTRICT SUPERINTENDENTS ON IMPORTANCE OF CERTAIN EDUCATION SERVICES OF I.U.'S.[(a)]

I.U. Service	Percentage of Responding Superintendents Who Receive the Service from their I.U. &		Percentage of Responding Superintendents Who Don't Receive the Service from I.U. &	
	(1)Consider it Important	(2)Don't Consider it Important	(1)Consider it Important	(2)Don't Consider it Important
Instructional Materials Ser.	87%	7%	0%	6%
Continuing Professional Edu.	52	21	9	18
Curriculum development	57	12	16	15
State & Federal Agency Liaison	51	12	12	25
Finan. Mgmt. & Long Range Planning	50	11	7	22
Ed. Planning Services	42	12	12	33
Bulk Purchasing	37	8	10	45
Pupil Personnel Services	37	7	10	45
Data Processing	26	9	15	50
Fine Arts Program	20	14	9	57
Vocational Ed. Services	27	4	12	57
Mini-grants for Teachers	19	10	10	62
Research Projects	25	4	12	58
Union Negotiations Assistance	18	4	23	54
Remedial Education Programs	8	5	12	74
Training Teachers Aides	6	4	10	80
Summer Recreation or Ed. Programs	3	3	6	88

(a) Does not include special education services

Source: Legislative Budget & Finance Committee "Questionnaire to Superintendents of Public School Districts Regarding Intermediate Unit Services."

considered curriculum or instructional improvement services;
(3) 7% (12 responses) of all items listed was inservice education (for professional and/or non-professional employes);
(4) 7% (11 responses) of all items listed was in the area of state and federal agency liaison (including especially provision of a representative for school districts to the state legislature);
(5) Some of the other responses included: various additional special education services (gifted, SED, etc.), pupil transportation, legal services, public relations help, wage tax collection, research, equipment repair (typewriter, audio-visual), pupil personnel services and professional library.

i. Each superintendent was asked to list services which his school district presently receives from its I.U. but which the superintendent believes the district could better provide for itself; 68% of all responding superintendents did not list any such items; those who did reply indicated an aggregate total of 49 items that they would rather do for themselves; the listed items can be summarized as follows:

(1) 45% (22 responses) of all items listed were various "special education" type services (including especially psychological services and speech therapy);
(2) 18% (9 responses) of all items listed were management type services (especially data processing and bulk purchasing);
(3) 12% (6 responses) of all items listed was inservice education;
(4) 10% (5 responses) of all items listed was curriculum services;
(5) Some of the other items listed included: long range planning, remedial reading, and state-federal relations;
(6) Also significant is that of the 17 superintendents of fourth class school districts that submitted a questionnaire response, none of them indicated any I.U. services they would rather provide for themselves; on the other hand, 36% of the replying third class districts and 39% of the replying second class districts listed at least one I.U. service that they would rather provide for themselves.

j. The majority (55%) of all superintendents who responded to our questionnaire indicated that their school district operates at least one type of special education class; that is, they do not depend on the intermediate unit to provide all special education. Of these 75 school districts who operate a special education program:

(1) 59% operate only classes for the educable mentally retarded (EMR), (replies from 4th class school districts indicated that their special education programs are almost universally limited to EMR);

(2) 25% operate EMR classes plus 1 or 2 other types of special education classes (most often including classes for the learning disabled);
(3) 13% operate EMR classes plus 3 or more additional types of special education classes (second class school districts especially offered a wider range of special education services);
(4) 3% (2 school districts) do not offer EMR; one of these districts offers just a gifted program and the other offers only classes for the learning disabled and emotionally disturbed.

k. Each superintendent was asked to indicate whether or not their school district conducted for itself any of the services (other than special education) offered by the intermediate unit; and, if so, whether their school district had been excused from payment of a portion of I.U. operating costs. Replies can be summarized as follows:

(1) 90 of the total 136 respondents (66%) indicated that they do not conduct for themselves any services that are offered by the intermediate unit.
(2) 18 of the respondents (40% of those who conduct I.U. offered services themselves) indicated that their district was relieved of a portion of intermediate unit costs.
(3) 3 respondents indicated that their school district had requested to be relieved of all or a portion of the intermediate unit assessment and had been denied.

l. Each superintendent was asked to rate the "quality" of I.U. services received by his school district. Results of this rating were as follows:

(1) 101 superintendents (74% of all respondents) rated their I.U. services as "good".
(2) 26 superintendents (19% of all respondents) rated their I.U. service as "average" in quality.
(3) 4 answers were "not sure" and 5 superintendents believed the quality of I.U. services to be "bad".

m. Superintendents were asked if they were aware of any systematic measurement of service quality or "objective" attainment conducted by their I.U. in relation to its services; replies indicated that:

(1) 66% of respondents (90 superintendents) were not aware of any such measurement system;
(2) 28% of respondents were aware of such measurements being carried on by their I.U.; and
(3) 8 respondents did not answer the question.

n. Superintendents were asked to list major "problems" that their district has had or is having with their intermediate unit. The following are examples of "problems" listed by individual superintendents:

(1) I.U. salaries higher than district; too many high paid administrators.
(2) More help [needed] in curriculum planning and program evaluation.
(3) Disregard for districts schedule; lack of understanding of scope of operation.
(4) Lack of communication; lack of direction.
(5) I.U. area too large to provide most services.
(6) Needed a class for SED [socially and emotionally disturbed].
(7) Distance from central office [too far].
(8) Testing, placement, and recommendations for special education.
(9) Formula for reimbursement to I.U.'s.
(10) District Board of Director's thinks poorly of I.U.'s.
(11) IMC costs based on inverse of aid-ratio [refers to instructional materials service center].
(12) Have not met teachers requests for IMC.
(13) Accessibility of I.U. staff.
(14) Districts are picking up [extra] share of the cost since state hasn't increased funding.
(15) Advisory Council gives too little advice.
(16) A-V Repair.
(17) Budgeting and resource leadership.

o. The superintendents opinions as to whether the I.U. program of services and overall operation is responsive to the needs of the school district were:

(1) 112 of 136 respondents (82%) reported "yes"
(2) 15 respondents reported "no"
(3) 3 reported "yes and no" and 6 did not answer

p. Superintendents were asked to report their perception as to whether the I.U. is a "locally or state" controlled organization:

(1) 57 of the respondents (42%) believe the I.U. is locally controlled;
(2) 60 (44%) believe the I.U. is state controlled;
(3) 13 indicated a belief that I.U.'s are both locally and state controlled; and
(4) 6 did not answer the question.

q. Superintendents were asked to submit comments concerning changes in I.U. operation which they believe would be beneficial to their district; the three most frequently mentioned areas of concern were (1) financing of I.U.'s, (2) need for additional I.U. services, and (3) local control of I.U.'s. The following is a list of some of the comments submitted; the comments are organized under the three areas of concern just mentioned, plus a category of "miscellaneous comments":

(1) Comments about "financing" of I. U.'s: (in re: item q)

(a) If we are to have I.U.s they should be allocated sufficient funds to meet their budgeting needs. School districts have enough of a problem in finding money to provide for their own programs.

(b) I believe the state should provide funds to employ additional personnel.

(c) More state support to the budget of the I. U.'s in the Commonwealth.

(d) No services should be instituted unless districts ask for them. Only those districts using a service should be billed. The state should fund the services for districts who can not provide their own. That's what the state organized the I.U.'s to do, we thought.

(e) Under-financed. I am sure the I. U. could do an even better job if the financial support was increased.

(f) Modification of formula for participation in I. U. program. Amend law to put contributions on a "cost of services" basis rather than "aid ratio/WADM" basis.

(g) State should pay costs of I. U.

(h) Change funding to provide a larger share from the state, thereby, increasing services to ...

(i) Base district cost for I. M. C. services on a per pupil cost not inverse proportion of aid ratio.

(j) From a financial standpoint--consolidate the entire operation for non-instructional services.

(2) Comments about Need for Additional I. U. Services: (in re: item q)

(a) I am constantly making suggestions to the I.U. director that he is trying to implement. I feel the smaller districts such as this one need more assistance in instructional areas. Need more direct "hands-on" help as personnel in these areas are not included or fiscally possible for districts of this size.

(b) Need more direct services such as negotiation information in I. U., curriculum planning, long range planning. Need more forceful leadership and a bigger staff.

(c) I. U. should take more initiative in directing new programs. Example: Long Range Planning. Since our local district is involved in this area funds should be available to us from I. U. to help implement our planning.

(d) 1--More work in the area of data processing. 2--More work in the area of curriculum developments.

(e) With increased demand on time for labor relations, collective bargaining, etc., local districts need support service in this area.

(f) Develop I. U. area, inservice programs for both professional and non-professional staff.

(g) Furnish a resource program or a contact between the local district and state in regard to all Federal Programs.

(h) Bargaining information with teachers should be pooled through the I. U.

(i) Provide negotiations services to all I. U. units.

(j) Provide more state and local research data.

(k) Consider the creation of a professional resource center.

(3.) Comments voicing concern over control of I.U.'s: (in re: item q)

(a) I see more use of the I. U. by the state to disseminate and collect materials which should not happen. The I. U. should never become an administrative arm of the Department of Education.

(b) Local districts should be more involved in planning.

(c) There is a general feeling on the part of districts within the rural counties... that the "Balance of Power" lies too heavily with ___ County. Perhaps, it very well should, however this real or imagined inequity does create problems at times.

(d) Needs assessment of local districts should be conducted annually by I. U. staffs so that I. U. becomes more responsive to local district needs.

(e) More visitation and interaction with local school districts by I. U. resource and administrative personnel.

(f) A major re-organization is desperately needed to be responsive to the needs of the school districts.

(g) Limit state control and mandates for I. U. to allow for better service to local priorities.

(h) The intermediate unit system provides unique services to local school districts. However, I. U.'s would be more responsive if they were to receive local direction rather than being an extension of the Pennsylvania Department of Education.

(i) Keep it on local control.

(4) Miscellaneous Comments: (in re: item q)

(a) I feel that we have taken some positive steps as a result of developing a better format for communicating our needs to the I. U. through our Advisory Council. Each year a superintendent is elected as chairman of the group and works closely with the I. U. director.

(b) Anything done by I. U. would be an improvement. Its size may be its most difficult problem. For example, it is a 50 mile drive from our area to the I.U. office.

(c) Other than for the management of special education in the state institutions and the I. M. S. we could use the money to better advantage in our districts.

(d) There should be a thorough evaluation of intermediate unit operations and services by an outside, independent organization which reports back to the Department of Education or the Legislature for action on their recommendations.

(e) Fund local district sufficiently and phase I. U. out. Neighboring school districts could contract jointly for services we need. This would eliminate the need for a number of high-paid administrators.

(f) More personnel needed to provide services. The district is too big geographically and the personnel too few.

(g) A critical re-evaluation of functions and elimination of functions which could be handled more effectively locally. If "bigger was better" without reservation, New York and Philadelphia would be among the best districts in the nation.

(h) Eliminate the I. U. and provide a more effective liaison between the PDE and local districts.

(i) Perhaps, the advisory council for the areas of special education and pupil services should meet regularly.

(j) Most I. U. services could be provided by the local district.

(k) Very satisfied.

(l) We are well pleased with our services and costs.

r. Superintendents were asked to comment on whether the intermediate unit system is an improvement over the county school offices that the I.U.'s replaced; their replies were as follows:

(1) 101 of the 136 respondents (74%) reported that the intermediate unit system is an improvement over the replaced County School Offices.
(2) 17 respondents (13%) reported that the I.U. System is not an improvement over the County School Offices.
(3) 4 respondents had mixed answers (yes and no).
(4) 14 superintendents felt they could not compare I.U.'s to the county school offices.
(5) Comments on this subject were submitted by several superintendents; examples of the comments are as follows:

(a) Selected Comments from Superintendents who feel I.U.'s are an Improvement over county school offices:

County Office was completely autocratic and dictatorial-- I. U. is more democratic and responsive to majority council members' opinions.

Services offered by the County System were practically negligible.

We feel more involved because the intermediate unit functions as a service organization to meet our needs. Not as an evaluating, superior type unit.

The I. U. is head and shoulders above the old County system.

More highly qualified personnel.

Centralized services.
Better leadership
Less overlapping
Better expenditure of funds

Provides only those services that the districts wants. Costs have decreased.

It is a supportive approach rather than a controlled operation ....

I. U. is service oriented. Services now offered to districts cooperatively which was impossible to do by County Office.

More services oriented. Less control of the operations of local school districts.

More specialized services. Improved staff.

It has much more to offer in the way of services and/or professional help.

It provides many more services and does a much better job of it.

More services are being offered and the I. U. is more service oriented.

Much more responsive to individual requests... Continuing vibrant leadership from the I. U. director and his assistants.

The I. U. is a service unit.

1--expanded services. 2--more expertise in specific areas--specialization. 3--improved liaison with state Department of Education.

1--bigger and better staff. 2--primary emphasis is to provide service to local districts. 3--local superintendents have greater involvement in overall intermediate activities and direction.

Our district did not get any services from County School Offices.

The larger size of the I. U. allows that individuals can become quite expert in a more narrow field.

(b) Selected comments from Superintendents who feel I.U.'s are not an improvement over the county school offices:

There has been no appreciable increase in number or quality of services provided.

The size of our I. U. has, in my opinion, approached a point of diminishing returns.

The service has been enlarged but there is a loss of local contact.

Closer contact in relationship with the County Unit.

Neither is necessary.

It is much more"remote" in all regards.. It has combined the districts of 3 counties with little or no discernible commonality of interests. It seems to be more "authoritarian".

The I. U. services 19 districts so that travel time is staggering. "Our suggestion is dividing the four counties into 2 each."

I do not feel that we have needed either service.

We are located 65 miles from our I. U. Office... There are no more services.

I have mixed feeling about this. Intermediate Unit is very much worthwhile. However, the "old" County Office was only two blocks away, the Intermdiate Unit Office is 100 miles--round trip."

A county school district had the advantage of having its administrative services through the County Office.

The operation is much the same and their is a lack of organization that makes many of their services ineffective.

Administrative leadership is lacking and Board of Directors are not open to change.

Overhead is greater, but no improvement in service.

Geographically too large. There is no center of population to provide a nucleus of operation. Programs desired by the smaller districts do not receive approval because of the larger districts.

s. Superintendents were also invited to submit "other comments" regarding the intermediate units as they wished; the following are examples of such comments which were submitted:

(1) I.U. __ has been particularly effective in providing services in curriculum development, education quality assessment, long range planning, psychological testing, education of trainable mentally retarded, and education of the socially and emotionally disturbed. The administrative staff is quite efficient, capable and has established an excellent rapport with member school districts.

(2) Overall you will note that I am appreciative of three key services that the intermediate unit provides. These services include: special education, management services, and curriculum development.

(3) It appears that the I.U.'s are becoming an administrative arm of the Secretary of Education and the State Board of Education. This was not the original intent.

(4) Some of the leadership in intermediate units is abysmal. Apparently they were "leftovers" from the old County Office system. I believe that the fundamental purpose of creating intermediate units got lost. Is it a "service" organization of the districts it serves or is it a "branch office" of the Department of Education. It presently appears to be a hybrid. That is, it takes its direction from the Department of Education, but pretends to be locally controlled. The situation becomes more pronounced year by year. It is time that this drift be halted or the intermediate units should be considered and called district Offices of the Department of Education similar to that of PennDOT.

(5) I personally believe that a direct contact with DPE is more efficient in most instances. I don't believe that the I.U. is always able to justify its existence relative to expense. This is not the fault of their staff but the fault of the structure which was created by the state.

(6) Our I.U. has not developed as we expected principally because boards of educations in districts have not accepted it as a service unit. The problem of a "large" district and "small" district has not been resolved fully as of yet. Board members locally and in I.U. level have not bought the reason for establishment of I.U.'s. Local control is strong in this area.

(7) Major changes of regulations coming out of the state should be thoroughly screened at the intermediate unit level so that the intermediate unit can serve as a reference area or provide necessary leadership in implementing changes. In addition, the necessary funds for changes should be provided.

(8) The services from our I.U. office have been excellent. It is truly the service agent which it was created to be.

2. Report of Information Obtained from School Board Presidents

Public school district school board presidents were sent a two page/eleven question questionnaire regarding the intermediate unit system. The following is a summary of the information obtained from the "Questionnaire for School Board Presidents".

a. Questionnaire information:

(1) Total school districts in the Commonwealth. . . 505
(2) Number of school district School Board Presidents sampled (not including Philadelphia and Pittsburgh) 503
(3) Number of questionnaires returned 257
(4) % of sample responding. 51%
(5) % of respondents that indicated they were either present or past member of an I. U. Board . . . 25%

b. School board presidents were asked whether they look upon the I. U. as being primarily a "locally" or "state" controlled organization; respondents replied as follows:

(1) 132 board presidents (51% of all respondents) indicated a belief that I. U.'s are "locally" controlled
(2) 115 (43% of respondents) indicated a belief that I. U.'s are "state" controlled.
(3) 7 respondents indicated both local and state controlled, and 3 presidents did not answer this question.

c. School board presidents were asked their opinions on whether or not the intermediate unit program of services appropriately suited the needs of their school district; respondents replied as follows:

(1) 194 (75% of all answering board presidents) indicated that the I. U. program of services appropriately suited their school district's needs.
(2) 54 presidents (21% of respondents) indicated that the I. U. program of services did not appropriately suit their school district's needs.
(3) 7 respondents were unsure or gave qualified answers and 2 presidents did not answer the question.

d. The school board presidents were asked to rate the general "quality" of intermediate unit services; they replied as follows:

(1) 56 presidents (22% of all respondents) indicated excellent;
(2) 119 presidents (46% of all respondents) indicated good;
(3) 31 presidents indicated average;
(4) 4 presidents (2%) indicated bad;
(5) 6 presidents indicated not sure;
(6) 39 presidents indicated the quality varies according to program; and
(7) 2 presidents provided other responses

e. Each school board president was asked to indicate the three services most commonly received by his school district and which he considered to be the most important services; the services listed most frequently by the presidents were as follows:

(1) 191 (or 74%) of the respondents included "education of handicapped children" on their list;
(2) 161 (or 63%) of the respondents included "loan of films and other instructional materials" on their list;
(3) 102 (or 40%) of the respondents included "services to speech and/or language impaired children" on their list;
(4) 98 (or 38%) of the respondents included "psychological services and testing of pupils", on their list; and
(5) 55 (or 21%) of the respondents included "vocational-technical education services" on their list

f. Each school board president was also asked to indicate the I. U. services (if any) which he believed were not presently provided for by his I. U. in a satisfactory manner; the replies received can be summarized as follows:

(1) 94 (or 37%) of the respondents did not list any such services;
(2) 33 (or 13%) of the respondents indicated curriculum services;
(3) 32 (or 12%) of the respondents indicated financial management assistance; and
(4) 31 or (12%) of the respondents indicated continuing professional education services.

g. Each school board president was asked to indicate any current I. U. services which he believes his school district can better provide for itself; replies can be summarized as follows:

(1) 150 (or 58%) of the respondents did not list any such services;
(2) 32 (or 12%) of the respondents indicated curriculum services;
(3) 17 (or 7%) of the respondents indicated educational planning services; and
(4) 17 respondents indicated continuing professional education services for teachers

h. Each school board president was asked to list any services not now available from his I. U. which he believes should be added to the I. U. program of services; replies can be summarized as follows:

(1) 107 (or 42%) of the respondents did not list any services;
(2) 33 (or 13%) of the respondents indicated bulk purchasing of materials;

(3) 26 (or 10%) indicated collective bargaining services;

(4) Several of the school board presidents gave singularly specific suggestions and some of these were:

    (a) "Recruiting personnel"
    (b) "Equipment repair service"
    (c) "Standardized curriculum in all districts"
    (d) "Career guidance to students"
    (e) "Inservice Programs in the following areas: for School Administrators, School Finance - Multi-Media Approach to Instructor Scheduling of Students For High School Principals - Boardmenship for Board members."
    (f) "Teacher evaluation"
    (g) "None because the cost effectiveness is too low."
    (h) "Until we receive satisfactory service from the I. U. in the things we need, such as liaison with federal and State and more help for our handicapped children, I see no need to specify services we think should be needed."
    (i) "None - Basically, we do not believe in I. U. service, could be provided by district cheaper."
    (j) "It is my opinion that a lot of the services we have should be deleted."
    (k) "Early detection/remediation of learning difficulties."
    (l) "It would be better to improve current services before expanding them."
    (m) "Provide info about rest of districts of I. U."
    (n) "Federal and State funding for Mini Grants for teaching, classroom projects."
    (o) "Psychiatric treatment after diagnosis."
    (p) "Follow-up after psychological evaluation."
    (q) "Population changes to determine building needs."
    (r) "Cooperative Alternative School comparable to Vo-tech, i. e., specializing in perhaps languages, intensive study units, etc."
    (s) "Non-English Speaking Programs."
    (t) "Transportation for out of state pupils."

i. Each school board president was asked his opinion on whether the program of services offered by the intermediate unit is currently "too limited", "too broad", or "appropriate for his school district's needs";replies received were as follows:

    (1) 166 (or 65%) of respondents indicated "appropriate";
    (2) 39 (or 15%) indicated "too broad";
    (3) 31 (or 12%) indicated "too limited"; and
    (4) 21 respondents either provided some other answer or did not answer at all.

j. Each school board president was asked his opinion as to whether the Intermediate Unit System is an improvement over the County School Offices that the I. U.'s replaced; replies were as follows:

(1) 160 (or 62%) of the respondents thought the I. U. system to be an improvement;
(2) 36 (or 14%) of the respondents thought the I. U. system was not an improvement over the County School Offices;
(3) 57 (or 22%) indicated that they are not sure and 4 presidents did not answer this question.

k. The school board presidents were invited to provide comments if they so chose; the following is a list of comments provided by the presidents (they are arranged by the I. U. which the school district is located within):

(1) Comments of school board presidents of districts within I.U. #1

The I.U. provides essential services that would be very costly to the school district. Many services could be expanded to help districts.

Without question, a definite improvement over the county's system.

Too large and interpersonal.

The level of educational competence in our school district surpasses that of our I.U. If their competence were increased, perhaps their programs would be more germane.

The I.U. best serves those areas where our need is so small that we can not afford to pay for full-time staff.

The intermediate unit is a politically oriented organization whose chief service to our district is to relieve us of our used personnel. (business manager hired, our best principal solicited)

Believe districts would appreciate I.U. if had option of belonging and contributing funds. Would then realize that services provided could not be duplicated locally for same amount.

(2) Comments of school board presidents of districts within I.U. #3

I.U. #3 represents $______ - not receiving value, absolutely not accepted by superintendent who does not cooperate, not very difficult to get any meaningful help - tried for financial help.

Service component - SERVICE. Reorder priorities and convince districts that old county watchdog system is not what I.U.'s are about....

I.U.'s have taken on a distant and aloof position in their relations with school districts - we meet at annual conventions to pass budget (which includes a slide show) without any real contact on a day to day basis.

I.U. #3 is doing an outstanding job in all the areas in which it is involved. Its offerings are broad and varied. Its professional leadership is superior and should receive credit for the outstanding performance. There is too much State interference and control.

The Allegheny intermediate unit's staff are doing an excellent job and are to be commended for their efforts.

Financing of the intermediate unit is dominated by the State, I.U. Board has very little authority under the budget constraints of State Department of Education budget.

AIU operates on the premise that it is a service organization for the 46 SD's. - Supt's. are definitely part of the input and the AIU Board is considering ways to better inform the individual I.U. Board members in the 46 districts.

Tax dollars that are being used to provide office space in an area that private industry can not afford could better be utilized on a local level.

The I.U. provides greater assistance to the school district than did the former county school office.

(3) Comments of school board presidents of districts within I.U. #4

I.U. has more services available, but I feel they have to try harder to sell them to the school districts.

We were an independent district prior to I.U. establishments. We preferred it this way. I believe that the intermediate unit office may be over staffed, especially with high salaried personnel.

I believe I.U.'s like local school boards, are too tightly controlled by the State Board and the Department of Education. My opinion may be biased for these reasons: (1) I think that parents who conceived the children, bore them raised them, and paid for their education should have a greater voice in what they think is needed rather than the supposedly "elite" group in Harrisburg. Too few people are trying to remake the world in their image. (2) Any governmental department that sits in a capitol writing letters but never spending one night a year in a local governmental area just listening is out of contact with the people. This includes the Department of Education.

I feel that our worst area is special Ed. and it is caused by no cooperation on the part of the I.U.

The I.U. has improved most services. Psychological services are not as good under the I.U. as they were under the county office.

The executive director of our I.U. has helped our district greatly by giving advice to our Administrators when needed!

In my opinion there are too many board members who do not understand the purpose of the intermediate unit. More communication and PR work is needed.

Feel we are very well serviced.

(4) Comments of school board presidents of districts within I.U. #5

Services were too general to satisfy our district.

I feel that the I.U.'s today are another (attempt) of the PDE to gradually reduce local control and centralize all public controls under the Secretary of Education thereby eliminating all local control such as is occurring throughout reorganized districts.

The intermediate unit is a service organization performing the needs of the local district. It is a big improvement over the old County system in terms of services provided. We could not offer some of the special programs available to the students and teachers if we did not have the intermediate unit. The I.U. needs to be strengthened through greater financial assistance on the part of the State Legislature.

County School Offices too often were simply agents of the State, they checked reports, filed many papers, offered a few services, were not innovative and lacked foresight. I.U. #5 offers services, is innovative and has proven itself to be of great assistance to all concerned.

The Northwest Tri-County Intermediate Unit (#5) has done a good job of providing services to our School District.

(5) Comments of school board presidents of districts within I.U. #6

I tend to feel that the programs in our I.U. 6 member districts, suffer due to the fact that I.U. #6 is responsible for the education of those "educables" at Polk State School.

Service is a poor word. I view the I.U. as a glorified county office. Controlled by the State Department of Education and its Secretary. Note mandates and monthly meetings of all I.U. chiefs in Harrisburg. Are not or can not be sensitive to local needs. And very expensive. Too much for parochial and private schools.

I believe any program that does not contribute to kids and education can not be justified. Diaper changing and babysitting does not contribute. Many programs are taxpayer rip-off.

I.U. #6 has just employed a new director and hopefully services will improve.

Fearful of it becoming a super-board down the road.

(6) Comments of school board presidents of districts within I.U. #7

There are more specific specialists in areas that were previously being covered by men who were trying to cover too much territory with too little time.

I feel we are moving toward a more central (State) control of the school districts.

The I.U. can not be all things to all school districts (17 districts) yet that seems to be the intent.

With more cooperation between the I.U. and DOE many questions could be answered without the local district having to ask the department in Harrisburg.

(7) Comments of school board presidents of districts within I.U. #8

Bulk of best services had been provided originally by county School Office in Blair County.

School districts should be enlarged and intermediate unit systems abolished. They have too much high-priced staff, while local school districts staff is overworked.

The I.U. 8 - is too removed from the local district - in my honest opinion the I.U. with its own self-serving hierarchy - it seems to be top heavy with administrators - it is like a ship without a rudder.

This unit has lost contact with individual districts because of the vast amount of districts it serves. It is definitely not an improvement over the County Office.

I have served as an intermediate unit director since its inception. It is virtually impossible for a layman director to keep up with the growth and requirements of this organization. I have found it to be a melting pot for directors seeking to gain political recognition or public recognition. I would hate to see the State gain further control of "local" education, but I don't think the I.U.'s are doing a job.

I.U. #8 is well organized to serve the needs of our rural area. The biggest drawback to even greater service is the collective inability of this area's School Districts to adequately finance I.U. #8's operation. We desperately need a larger State subsidy, not for grandiose programs, but for basics like reading and math skills improvements.

The purpose of the mergers of School Districts in the 1960's was to create districts large enough to provide the many services and programs needed by students. Districts of the second class... provide all of the programs the Intermediate Unit provides, with the exception of the Instructional Materials Center. When personnel are hired by the Unit, (large districts) pay a disproportionate amount of that expense, and do not receive the services provided by that person... the intermediate unit might serve a purpose for smaller districts. Those services beyond very basic supportive services provided by a Unit should be provided to, and financed by, only those districts receiving the services.

I feel individual school districts should not be compelled by the State to provide a program for so-called gifted or talented children. I do feel that a program for handicapped children is a must.

(8) Comments for school board presidents of districts wihin I.U. #9

We enjoy a workable relationship with I.U. #9. Never any exercise of domination. A system of financial checks and balances is needed; I.U. boards do not exercise enough strength over personnel of I.U.

It seems that the State is giving to I.U. more power than it originally stated would be the role of the I.U.

Our intermediate unit is doing a fine service in our area, but limited because of sparcity and monies available.

I feel that intermediate units should be service-oriented toward the local districts rather than serving as an extension of the Department of Education.

(9) Comments of school board presidents of districts within I.U. #10

We are rapidly losing local control. Therefore, losing local interest. Which in return causes lack of communications from citizens and results in little or no understanding.

It is felt there could be a much more positive force and exert more leadership than they do. We have several very fine people, but many are passive in their efforts.

(10) Comments of school board presidents of districts within I.U. #11

We never have a full board at a meeting, usually members of two counties never or very seldom come.

I feel the I.U. is a waste of taxpayer money.

(11) Comments of school board presidents of districts within I.U. #12

It is the opinion of the undersigned that the size of the intermediate unit is too large, and it is not accessible enough to a rural district far away from a large municipality.

The State mandates far more programs than it is willing to fund. This condition must not be permitted to continue.

I feel the intermediate units should concentrate their efforts on the education of exceptional children.

Two factors have limited the success of I.U. #12: (a) Geographically poor alignment of counties (b) unfortunate situation re the illness and subsequent death of a first executive director - the project did not get a fair start.

Concerns: State mandated programs without appropriate funding. Geographically unwieldly area; taking-over of all private educational facilities at expense of public programs.

We believe that our local directors make a sincere effort but in light of the regulations, guidelines, etc., from the Department of Education, not much discretion remains. This is especially true in Special Education.

I think the I.U. has become too large and impersonal.

The quality of service received from the I.U. depends largely on the personnel with whom we deal. The speech and psychological services received by our district are satisfactory because the people working in these areas try to make it so. The film library is well organized. Our chief problem in the other areas is the constant run-around we get when trying to work with people. There is also data to show that the other two counties in the I.U. receive much better help than York County in spite of the fact that York County students comprise the bulk of the I.U.

I believe the I.U. should provide only services requested by districts. I.U. most not have the power to mandate any district programs.

(12) Comments of school board presidents of districts within I.U. #13

I was apprehensive about the larger I.U. system in place of the County Board, but we have been pleased with both the services offered and the personnel involved at this point.

There is nothing an I.U. can do that school districts can't do jointly, better and cheaper, e.g., Vo-Tech school, community colleges, etc.

(13) Comments of school board presidents of districts within I.U. #14

The I.U. Board should have a board member from each school district in the county; not just some. Often the I.U. seems more like competition than assistance. Communications are often late or nonexistent.

(14) Comments of school board presidents of districts within I.U. #15

It appears to me that the CAIU is doing an excellent job for the area generally and particularly the small districts.

I.U. administrative costs too high. Excessive demands on local staff for I.U. meetings and preparation o paper work. I.U. services are being interpreted by PDE as being directives; thus eliminating concern for local needs.

The I.U. should continue to serve locally as intended originally and be alert to and resist movements that tend to make it more of a State agency.

The intermediate unit concept is a definite plus for local school districts, however, I am concerned about the increasing State regulations that are being placed on the intermediate unit.

(15) Comments of school board presidents of districts within I.U. #16

Feel that the Unit has grown too rapidly in a relatively short time. Rapid growth has caused problems that could have been avoided.

It is my opinion that each school district should have representation on its respective intermediate board.

I.U. 16 is a very good unit and I feel comfortable about their total program. What I am apprehensive about is the unknown or what is "really going on" in the other I.U.'s across the State. Without the input of our superintendent the checks and balance system would be lost. There could be an uncontrollable bureaucracy developed without the Superintendent's and an advisory staff. I guess it boils down to are we getting the services we are paying for through this large animal (the I.U. units). I would like the I.U.'s checked for oversupply of personnel along with programs.

I firmly believe that if the monies used in the I.U. were turned over to the districts involved, (even division of the I.U. budget) the districts could run most of their own programs.

(16) Comments of school board presidents of districts within I.U. #17

I am concerned by the apparent trend of "take-over" by the State.

From the beginning, the services of I.U. 17 have been those formerly provided by the four county boards (mainly Special Education) and those services asked for by the member districts. This philosophy has been most successful in holding costs in line, providing only those services the districts cannot supply individually. However, we are now seeing the State Board of Education and the Secretary of Education mandating services, services not mandated by the General Assembly.

No more costly services should be added. Reports are that Data Processing will be mandated. At whose expense? We do not feel this is necessary.

It would seem that the Sate is bent on giving administrative responsibility rather [than] "service" functions to the I.U. This will work in some areas and not in others.

Over all I.U. number 17 does a very good job. Most problems lie in the home or local districts. They are reluctant to request the aid of the I.U.

Our district is large in area but rather sparse in population; consequently, we have no representation.

I.U. 17 is providing good services to our particular district in a conscientious manner.

As a second-class school district we provide all services except "Speech" which we recently transferred to the I.U. We are involved very little with the I.U.

There should be some formal means whereby personnel in the I.U. are evaluated by the school districts and needed staffing changes could follow suit.

I.U. unit is becoming and is used too much as an instrument of the State Department of Education. Old unit was much better. I.U. was to be less costly. Is it???

(17) Comments of school board presidents of districts within I.U. #18

I appreciate the services the I.U. has given us in the past and am looking forward to our combined efforts toward Tunkhannock's new Vo-Tech school.

I believe the Intermediate Unit system could provide bulk purchasing of school supplies and other items, school bus transportation of pupils, summer recreation programs [and] Pre-school education programs ... if the Intermediate Unit received reimbursement from the State for these programs.

More improvements the system could provide, if later on they are successful and would be reimbursed by the State, are pre-school education, bulk purchasing of supplies for schools, school bus transportation of pupils and summer recreation programs.

(18) Comments of school board presidents of districts within I.U. #19

I have served on a local board for 18 years and the I.U. board for 4 years. The I.U. is needed to supplement programs that either cannot be afforded or initiated by individual boards.

Our I.U. is a carry-over of the county office. Many salaries are excessive....

___ school district provides most of the services itself. Feel we could continue our own programs at less cost than participating in I.U. - particularly audio-visual.

Ours is an excellent I.U. rendering excellent service.

(19) Comments of school board presidents of districts within I.U. #20

I.U. 20 provides excellent and much-needed services to the smaller districts, but districts our size provide all of them ourselves, so it is not much help [to us]. The problem with this questionnaire is that it is not "weighted" making it "equal" to others received, but "unequal" in terms of pupil and financial support.

Dr. Huber and the intermediate unit is cooperating in doing an excellent [job] for our school district.

I am sure that different districts utilize different services from the I.U. However, I think that I.U. 20, with the fine leadership of Dr. Huber, is one of the best resources our district has available.

I believe that the State should allocate money for I.U. building needs. The buildings that these youngsters are housed in, are in most cases, in very poor condition. They [the I.U. pupils] are not second class citizens.

(20) Comments of school board presidents of districts within I.U. #21

I'm afraid that the services of the I.U. are rather obscure to most school directors. We seem only to find out when the problem arises and we check. Otherwise, they have a low profile, not sure if they are excellent or lousy.

We could certainly review some of the services and costs to receive them.

The primary difference between the old county office and the I.U. was that of line versus staff roles. The I.U. was supposed to be a unit to provide educational services needed by the local district it serves. The State steadily increases its dictates, mandates, and imposed priorities on I.U.'s, thereby sapping the energy from local priorities of services.

I.U.'s should remain as units controlled by supporting districts.

(21) Comments of school board presidents of districts within I.U. #22

Per my comments, I would prefer that the State allocate our proportion of I.U. funding directly to us where I believe we would spend it in a more beneficial way in the interest of the children and taxpayers of ________________.

[Our school district] is happy with the services furnished by I.U. 22. Some people on I.U. staffs, however, tend to overemphasize their importance to the overall educational picture.

(22) Comments of school board presidents of districts within I.U. #23

As established, the I.U. is controlled by a small area of the county. Services are too broad in the sense that they are trying to do more than can be done effectively. Concentration of talent and money on important areas would be an improvement to districts.

I would desire to have the I.U. remain a service organization with as much local control and input as possible.

Our district seems to have good relations with the I.U.

Exactly the same as county - too little change.

It is virtually the same! The I.U. should be the spearhead in the development of services for the member districts.

[There has been] great improvement of the administrative staff over the last few years.

Since the county coverage is the same as the I.U. coverage, there was no change apparent.

Special Ed - gifted - Vocational [education] are great - the Federal and State Programs, many forced upon our I.U. to sponsor, are not of local value - example Graterford Prison, etc.

(23) Comments of school board presidents of districts within I.U. #24

Structural potential is available. Only restrictions are due to capability of existing personnel in key roles. There has been progress but it is not dynamic. More Staff oriented than taking leadership position.

Would like to see less state control in our educational system!

When we had a lot of one-room schools the county office had a function. In today's system all districts are self-sufficient and in many cases can do more than the I.U.

I feel that the I.U. should provide a broader program in fewer areas particular to the school district.

(24) Comments of school board presidents of districts within I.U. #25

Our school district is quite pleased with service rendered by the Intermediate Unit, and particularly the cooperative manner in which services are offered and rendered.

(25) Comments of school board presidents of districts within I.U. #27

They have no delegated power to direct the local board, and have no sustaining direction between state and local board.

Services have expanded with the introduction of the intermediate unit system because they are more in touch with the problems which exist throughout the county.

(26) Comments of school board presidents of districts within I.U . #28

I question [whether] the I.U. system is needed in this state.

(27) Comments of school board presidents of districts within I.U. #29

I feel the new facilities for the handicapped at Mar-Lin is one of the best things to happen in Schuylkill County.

Intermediate units should be eliminated.

3. General Observations from Opinions of School District Officials Regarding I.U.'s

Perhaps the most significant observation that can be made is that the general concensus of opinion of the school district officials queried appears to be that the intermediate unit system is an overall improvement over the county school offices that were replaced by the intermediate units. The intermediate units are considered to be more service oriented than the county school offices and school district personnel apparently are pleased by this. The intermediate units are generally considered to be responsive to the needs of their school districts, to have an appropriate program of services, and the "quality" of the programs is considered good. Further, there does not appear to be any uniform operational problem between school districts and intermediate units, with the possible exception of the "local control" issue. While the concensus of opinion among school district officials is generally favorable to the I.U.'s, however, it is important to point out that there are a number of both school district superintendents and school board presidents who expressed generally negative feelings regarding the I.U.'s as an organization and in relation to the needs of their particular districts.

The opinions as to whether the intermediate units are primarily "locally" or "state" controlled are divided about equally, with a few persons indicating that there are elements of each. However, there appears to be some concern at the local level about what is considered to be a gradually increasing role of the state government in intermediate unit operation. While local officials express such concern about increasing state control over I.U.'s, however, there was frequent mention by the superintendents and board presidents of the need for the Commonwealth to assume a larger share of the financing of the intermediate units.

Special education appears to be the intermediate unit service of greatest importance to the school districts. The intermediate units tend to conduct most of the more specialized special education programs such as education of profoundly mentally retarded children and speech language services. Smaller school districts have a tendency to rely entirely on intermediate units for the more specialized special education programs, whereas larger school districts often provide for themselves a wider range of special services. Instructional materials services appears to be the most commonly received non-special education I.U. service; and it also is generally considered to be the most important "non-special ed." service of the intermediate units. There was no substantial statewide expression by local officials for specific desired additional I.U. services or for desired curtailment of specific current I.U. services; however, desire for additional union negotiations assistance was indicated by several district officials, and continuing professional education services (for teachers) was the major I.U. service which receiving district officials most often failed to indicate as being important.

IV. COSTS ASSOCIATED WITH INTERMEDIATE UNIT PROGRAM

Although intermediate units have no taxing power of their own, virtually all funds expended by the I.U.'s are from public tax monies; the I.U.'s receive supporting funds in substantial amounts from all three levels of government - the federal government, Pennsylvania state government and local governments, including school districts and other local entities.

Using data supplied by 26 intermediate units[1] and the Comptroller's Office of PDE, our staff was able to estimate total I.U. revenues for FY 1974-75 at over $235 million and total expenditures at about $230 million. Data supplied to our staff appears to indicate that the majority of the I.U. revenues (about 60%) came from state appropriations, while about 20% to 25% came from local school districts[2] and about 10% from the federal government, with the remaining 5% to 10% coming from interest income and other sources.

Please note Chart K on page 139 which provides a summary of reported expenditures and revenue data for 26 intermediate units for the 1973-74 and 1974-75 fiscal years. (It is important to point out that the $144.1 million listed on the chart as "State Payments" for FY 1974-75 contains some local district share monies; see footnote c on Chart K.)

The expenditure totals reported by these 26 intermediate units indicate that the majority of all I.U. expenditures (over 62% in FY 1974-75) are in behalf of their special education programs; the second largest expenditure item in FY 1974-75 was services to nonpublic schools (Acts 194 and 195 which are no longer in effect) at 9% of total expenditures, with vocational-technical education and basic services to school districts accounting for 8% and 7% respectively, of total expenditures. The 26 reporting I.U.'s expended $11.9 million during FY 1974-75 on "basic services" to school districts; this includes services such as curriculum development, management services, educational planning, state and federal agency liaison, pupil personnel, continuing professional education, instructional materials, and other consultation and day to day services. A total of $17.6 million was reported by the I.U.'s under the category of "other expenditures." In general, these represent "special project" costs, often for programs funded 100% with state or federal grants. Examples of costs reported under this category are: $1 million for education of institutionalized children and $0.5 million for an "Early Childhood Development Center" by the Allegheny I.U.; $1 million for various ESEA federal grant projects (mostly for disadvantaged pupils) by the Midwestern I.U.; $0.9 million

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1/ Financial information was supplied to the staff of this Committee via questionnaire in the summer of 1975 by 27 of the 29 intermediate units (see Appendix A); such information was not used for one of the replying I.U.'s due to inconsistencies in the submitted data; for this particular I.U. and the two non-reporting I.U.'s estimates of their revenues and expenditures were made from PDE data and data collected by the Pennsylvania Association of Intermediate Units.

2/ A portion of these local funds are of course eventually reimbursed to local districts by the Commonwealth (generally via the basic instruction subsidy).

CHART K

SUMMARY OF FINANCIAL DATA FOR 26 OF THE 29 INTERMEDIATE UNITS(a)

	FY 1973-74 ($Millions)		FY 1974-75 ($ Millions)		%
I. Carryover-from Previous Year		$ 16.4		$ 15.2(d)	
II. Revenues					
State Payments(c)	$ 120.1		$ 144.1		82%
Federal Funds	15.8		21.1		11%
Service User Fees	6.1		6.5		4%
Interest Income	3.3		3.7		2%
Other	1.5		1.1		1%
Total Revenue		$ 146.8		$176.5	100%
III. Expenditures					
Edu. of Exceptional Children(f)	$ 80.0		$ 92.1		54%
Nonpublic School Services(b)	17.8		16.5		9%
Vocational-Technical Education	12.7		13.7		8%
Basic Services to Districts	10.6		11.9		7%
Pupil Transportation(f)	6.6		8.3		5%
Edu. State MH/MR Inst.(f)	1.9		4.4		3%
Edu. State Correctional Inst.	1.6		2.6		2%
I.U. Administration	3.1		3.5		2%
Food Service Programs(f)	.5		.5		-
Other Expenditures	13.7		17.6		10%
Total Expenditures		($ 148.5)		($171.1)	100%
IV. Year End Balance		$ 14.7(d)		$ 20.6(e)	

(a) Information not reported or used from I.U. numbers 6, 22 and 26: Source of all data is from respective I.U.'s.

(b) Acts 194 and 195, which have been subsequently replaced by Act 89 of 1975.

(c) Includes funds which are withheld from state subsidies to local school districts; about 25% of all state payments made to I.U.'s during FY 1974-75 were subsequently "recouped" by withholding from local school district subsidies; thus, about 1/4 of the $144 million shown on this chart as "State Payments" could in fact be considered as the local school district contribution to I.U. costs.

(d) Differences existed in the reported year-end balances and subsequent year's "carryover" for several I.U.'s.

(e) Note that reported total revenues and total expenditures for FY 1974-75 differed by $5.4 million; this "balance" total includes "carryover" from previous year.

(f) Generally all of these items are considered part of the I.U. "special education" effort, as well as certain items included in the "Other Expenditures" category on this Chart.

for Neighborhood Youth Corps Programs operated by the Central Susquehanna I.U.; and, $0.4 million for "day care" services by the Northeastern Educational I.U.

Detail information on income and outgo during FY 1974-75 for each of the 26 reporting intermediate units appears in Appendix A on pages 167 through 192 of this report. A careful examination of this information would show wide variations among the individual intermediate units in expenditure emphasis. For example, Allegheny I.U. indicated they expended only 0.7% of their total I.U. expenditures for pupil transportation, while, on the other hand, the ARIN I.U. (Armstrong & Indiana Counties) expended over 10% of its budget costs for pupil transportation. In another example, the Lincoln I.U. expended 71% of its funds in FY 1974-75 for "special education" instruction; on the other hand, Berks County I.U. reported a total of 30% of its expenditures were for special education instruction.

There are similar variances among the intermediate units in their reliance on various funding sources. For example, whereas the Midwestern I.U. (Butler, Lawrence, and Mercer Counties) reported obtaining 27% of its total revenues from the Federal Government in FY 1974-75, the Beaver Valley I.U. reported that only 0.5% of its revenues were federal funds. The following paragraphs of this section will provide background information on the major federal and state funding mechanisms for the intermediate units.

A. Federal Funding of I.U.'s.

There are numerous federal acts through which grants are made available to intermediate units. Chart L on page 141 provides a list of major federal acts under which I.U.'s receive monies; the Chart also indicates the specific amounts of grants provided to I.U.'s through the PDE under each respective Act during FY 1974-75. It is important to note that the $14 million in grants displayed by Chart L is not by any means inclusive of all federal funds received by I.U.'s in FY 1974-75 since I.U.'s receive grants directly from the federal government (i.e., rather than through the PDE) and in some cases through other state agencies, e.g., the Department of Public Welfare for day care programs.[3]

Chart M, also on page 141, provides a breakdown by certain I.U.'s of the $14 million in federal grants which was distributed to intermediate units through PDE in FY 1974-75. The reader may notice from this Chart that $3.1 million (about 20% of the total $14 million) was awarded to two I.U.'s (Montgomery County and Northwest Tri-County); by contrast, three I.U.'s not listed individually on the Chart (Colonial Northampton, Clarion Manor and Philadelphia) received less than $100,000 each of this $14 million in federal funds funnelled through PDE.

3/ Note page 139 of this report (Chart K) which indicates that 26 reporting I.U.'s indicated receipt of over $21 million in total federal grants during FY 1974-75.

CHART L

FEDERAL FUNDS GRANTED TO INTERMEDIATE UNITS THROUGH PDE, FY 1974-75, BY FEDERAL ACT[a]

(Amts. in Millions)

Federal Act		Amount	%
Elementary and Secondary Education Act		$ 8.6	62%
Title I	3.6		
Title III	2.4		
Title VI(Handicapped)	1.6		
Title VI(Reg. Res. Center)	.6		
Title V	.4		
Vocational Education Act		3.7	26%
Adult (Basic) Education Act		1.0	7%
National Defense Education Act (Title III)		.4	3%
Child Nutrition and School Lunch Acts		.3	2%
TOTAL		$ 14.0	100%

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CHART M

FEDERAL FUNDS GRANTED TO INTERMEDIATE UNITS THROUGH PDE, FY 1974-75, BY I.U.[a]

(Amts. in Millions)

Intermediate Unit	Amount of Federal Funds	% Of Federal Grants
Montgomery County	$ 1.9	13%
Northwest Tri County	1.2	8%
Capital Area	1.0	7%
Allegheny County	1.0	7%
Central Susquehanna	1.0	7%
Midwestern	.9	6%
Northeastern Educational	.8	6%
Lancaster-Lebanon	.6	4%
Central	.5	4%
Bucks County	.5	4%
Lincoln	.5	4%
Seneca Highlands	.5	4%
Chester County	.4	3%
Luzerne	.4	3%
I.U. #1	.4	3%
All Other I.U.'s	2.4	17%
TOTAL	$ 14.0	100%

(a) Source of information was Comptroller's Office, PDE; it is not intended to represent total federal funds available to I.U.'s in FY 1974-75, but only such funds provided through the PDE Comptroller's Office under the indicated Acts.

Federal funds received by I.U.'s are generally for either (1) specific projects or (2) particular programs; federal funds are generally not available to the I.U.'s for general operating or discretionary purposes.

The federal funds available to I.U.'s for specific projects (especially under ESEA Title III[4]) result generally from initiative on the part of the particular recipient I.U. in submittal of a project application to either PDE or the pertinent federal agency or initiative on the part of a particular bureau in PDE which "seeks out" a particular I.U. to serve as the local educational agency to implement a project. The kinds of specific projects funded in this manner range from heavily staffed continuing efforts such as the Pennscript and Pennsylvania Materials Center for the Visually Handicapped projects operated by Capital Area I.U. (see page 81 of this report) to projects of very short duration involving no full time staff such as the Science Leadership Project operated by Westmoreland I.U. (see page 77 of this report). Likewise the total number of federal projects operated and therefore amounts of federal funds received by individual I.U.'s vary greatly among the I.U.'s; I.U. Number 23, e.g., reported a total of approximately 15 individual federal project grants in FY 1974-75, whereas I.U. Number 29 reported operating only two federal projects. Examples of some of the projects funded in this manner are described in further detail on pages 74 through 94 of this report. A problem facing I.U.'s in operation of certain federally funded projects is what to do with staff persons who were hired to implement the project when the federal project funding runs out. I.U.'s handle this matter in various ways, ranging from assignment of persons from their permanent staff to the project on a temporary basis, to hiring persons employed by local school districts who take a sabbatical leave from their regular jobs, to seeking new federally funded projects which the staff can be transferred to.

The other form of federal grants to I.U.'s, i.e., grants for particular programs, involves generally monies which are anticipated on an annual basis to assist in or enrich the activities of regular I.U. programs. Examples of some of these program grants are (1) monies available under ESEA Title VI (Handicapped) which provide funds for education services to exceptional children, (2) monies available under The Vocational Education Act of 1963, including especially funds for equipment and capital construction of area vocational technical schools and funds for corrections education, (3) monies available under the Adult Basic Education Act, and (4) monies which have been available under the National Defense Education Act of 1958 to assist in the costs of the I.U. Instructional Materials Service Centers.

The majority of the funds provided to I.U.'s under ESEA Title I (see page 33 of this report) are for compensatory education services to school districts with high percentages of students from low income families; several I.U.'s serve as the administering agents for compensatory programs for all (or several) school districts in their area.

4/ This federal grant program is to be replaced by ESEA Title IV, Part C after the 1975-76 fiscal year.

B. State Funding of Intermediate Units

The majority of all funds supporting the I.U.'s comes from the State government through the PDE. Chart N on page 144 shows that state payments* totaling $189.2 million were made to the 29 I.U.'s during FY 1974-75. The largest portion of this amount ($133.7 million) was for the education of exceptional children;[5] as can be readily seen, other large state payment areas are nonpublic school services, I.U. subsidy, and pupil transportation. It is important to note that a portion of the payments under several of the state subsidy programs are indirectly financed by the respective local school districts located within the service area of each I.U. since the PDE withholds from subsidy payments due to those districts certain amounts as provided in the Public School Code.

Chart O on page 145 of this report shows the wide variation in per student state support of the intermediate units during FY 1974-75, ranging from $150 per public and nonpublic school pupil for Pittsburgh-Mt. Oliver I.U. to $29 per pupil in state support for Tuscarora I.U. It is important to note, however, that it may be unfair to draw conclusions about degree of state support to individual I.U.'s from the per student comparison chart because of the wide variations in emphasis of service programs among the respective I.U.'s and for other reasons. You may also notice from the information on Chart O that 43% of all State payments to I.U.'s during FY 1974-75 went to three of the twenty-nine I.U.'s (Nos. 2, 3 and 26).

The following paragraphs are intended to provide background information about each of the major state subsidies provided to the intermediate units.

1. Special Education

Chart P on page 146 sets forth total state special education allocations or expenditures by intermediate unit from FY 1971-72 through FY 1975-76. You may notice that total allocations to I.U.'s for special education increased by $72 million between FY 1972-73 and FY 1973-74 but that $52 million of this increase is attributable to Philadelphia and Pittsburgh receiving special education monies as I.U.'s rather than as school districts.

Please note also Chart Q on page 147 which shows the growth in state payments to I.U.'s for special education as compared to state funding of school district operated special education programs. The Chart illustrates that state funding for special education through the intermediate units has increased substantially during recent years while state payments to school districts for this purpose has remained, in total, relatively constant. For example, in FY 1971-72, school districts received about 31% of total state funds for special education; whereas, in FY 1975-76, districts are receiving only about 11% of state funds allocated for this purpose.

5/ Under provision of the Public School Code, the Commonwealth is responsible for payment of 100% of all extra costs incurred in educating exceptional children; i.e., all costs of providing extra or special educational service to handicapped, gifted or other "exceptional children". The appropriate school district is responsible for paying its share of "regular" educational costs for each such child.

*/ Not including "advance" AVTS payments to I.U.s that are operating agents for an area vocational technical school(s).

CHART N

STATE PAYMENTS TO INTERMEDIATE UNITS DURING FY 1974-75, BY APPROPRIATION(a) (e)

(All amounts millions)

APPROPRIATION TITLE	NET TOTAL ALL PAYMENTS TO I.U.'S.	AMT. LATER RECOVERED FROM SCHOOL DISTRICTS(d)	NET COST TO STATE(d)	PER CENT
Special Education	$ 133.7(b)	$ (40.0)	$ 93.7	67%
Nonpublic Schools(c)	25.2	-	25.2	18%
I.U. Subsidy (Gen. Operating & Capital)	11.3	(4.8)	6.5	5%
Pupil Transportation	11.0	(4.9)	6.1	4%
Education at State MH/MR Institutions	4.6	(.2)	4.4	3%
Corrections Education	1.4	-	1.4	1%
Other	2.0	-	2.0	2%
TOTAL	$ 189.2	$ (49.9)	$139.3	100%

(a) Source of data is PDE Comptroller's Office; all amounts reflect net totals paid to I.U.'s from the respective appropriation categories during FY 1974-75, in some cases, the amounts reflect payments from appropriations made in more than one fiscal year.

(b) Includes both General Fund and Federal Revenue Sharing Fund monies

(c) Includes both appropriations for equipment and for services to nonpublic schools

(d) Estimated

(e) State "advance" payments to I.U.s for operation of area vocational technical school(s) are not included.

STATE PAYMENTS TO INTERMEDIATE UNITS DURING FY 1974-75
BY INTERMEDIATE UNIT AND PER STUDENT

CHART O

INTERMEDIATE UNIT NAME AND NUMBER		TOTAL STATE PAYMENTS FISCAL YEAR 1974-75[a]	TOTAL NUMBER OF STUDENTS[b]	STATE PAYMENTS PER STUDENT[b]
Pittsburgh-Mount Oliver	(# 2)	$ 13,808,000	92,265	$ 150
Philadelphia	(#26)	50,411,000	392,797	128
Northeastern Educational	(#19)	5,394,000	67,303	80
Schuylkill	(#29)	2,463,000	32,052	77
Chester County	(#24)	5,272,000	69,660	76
Appalachia	(# 8)	7,431,000	104,162	71
Allegheny	(# 3)	17,312,000	248,403	70
Seneca Highlands	(# 9)	1,967,000	28,657	69
Intermediate Unit I	(# 1)	5,977,000	93,599	64
Central Susquehanna	(#16)	3,358,000	52,415	64
Westmoreland	(# 7)	5,571,000	91,700	61
Berks County	(#14)	4,216,000	69,745	60
Central	(#10)	2,568,000	44,059	58
Luzerne	(#18)	4,491,000	77,461	58
Beaver Valley	(#27)	2,800,000	49,173	57
Colonial Northampton	(#20)	3,833,000	68,096	56
Capital Area	(#15)	5,743,000	103,802	55
Delaware County	(#25)	7,016,000	136,546	51
Lincoln	(#12)	5,008,000	100,018	50
Montgomery County	(#23)	7,889,000	157,159	50
BLaST	(#17)	2,769,000	56,165	49
ucks County	(#22)	5,786,000	120,257	48
Northwest Tri-County	(# 5)	4,047,000	97,674	41
Midwestern	(# 4)	3,498,000	87,225	40
Lancaster-Lebanon	(#13)	3,971,000	99,548	40
Carbon-Lehigh	(#21)	2,554,000	64,428	40
ARIN	(#28)	1,423,000	37,127	38
Tuscarora	(#11)	750,000	26,173	29
Clarion Manor	(# 6)	[1,849,000][c]	NP	--
TOTAL FOR 28 I.U.'s.		$ 187,326,000[c]	2,667,669[c]	$ 70

(a) Source of financial data is PDE Comptroller's Office; all amounts reflect total dollar payments made to I.U.'s from state appropriations through the PDE Comptroller's Office during the period July 1, 1974 to June 30, 1975; in some cases, the amounts reflect payments applicable to expenses of other fiscal years than FY 1974-75; also, approximately 26% of the total payments of $189.2 million paid to I.U.'s was recovered from local school districts by withholding from their respective appropriations and does therefore not fully reflect a cost to the state.

(b) Based on total number of students, both public and nonpublic school, within the I.U.'s geographic area as reported by the respective I.U.'s.

(c) Amount for I.U. #6 is not included in total; student information was not provided by the I.U.

CHART P

Special Education Expenditures (Allocations)(a)
Per Intermediate Unit Per School Year
($ in thousands)

	1971-72 Expenditures	1972-73 Expenditures	1973-74 Allocations	1974-75 Allocations	1975-76 Allocations
1. Intermediate Unit I	$ 2,200	$ 2,813	$ 3,998	$ 4,541	$ 4,948
2. Pittsburgh-Mount Oliver	-	-	14,000(b)	15,430	17,127
3. Allegheny	5,904	8,879	12,500	14,094	15,603
4. Midwestern	1,180	1,541	2,135	2,494	2,658
5. Northwest Tri-County	1,376	1,939	2,540	2,894	3,238
6. Clarion Manor	466	631	825	1,005	1,135
7. Westmoreland	2,988	3,259	4,030	4,572	5,065
8. Appalachia	2,653	3,156	4,000	4,490	4,981
9. Seneca Highlands	783	1,105	1,412	1,611	1,781
10. Central	1,026	1,476	1,959	2,265	2,552
11. Tuscarora	300	376	555	612	702
12. Lincoln	1,483	2,463	3,550	4,039	4,499
13. Lancaster-Lebanon	1,207	1,787	2,145	2,599	3,445
14. Berks County	1,087	1,690	2,450	2,984	3,550
15. Capital Area	2,150	2,917	3,800	4,640	5,110
16. Central Susquehanna	1,048	1,422	2,016	2,310	2,575
[illegible]. BLaST	1,566	1,809	2,270	2,569	2,833
18. Luzerne	1,024	1,818	2,410	2,791	3,140
19. Northeastern Educational	2,385	2,994	3,920	4,320	4,823
20. Colonial Northampton	1,617	1,998	2,727	3,101	3,467
21. Carbon-Lehigh	993	1,227	1,637	1,817	2,019
22. Bucks County	2,311	2,904	3,650	4,034	4,397
23. Montgomery County	2,359	3,335	4,800	5,515	6,347
24. Chester County	1,481	2,140	3,050	3,517	3,941
25. Delaware County	2,078	2,820	3,533	3,881	4,045
26. Philadelphia	-	-	38,000(b)	41,680	46,288
27. Beaver Valley	1,342	1,597	1,864	2,164	2,417
28. ARIN	522	714	992	1,142	1,268
29. Schuylkill	790	1,032	1,434	1,622	1,800
TOTAL	$ 44,319	$ 59,842	$ 132,202	$ 148,733	$ 165,754

(a) Includes state support for special education classes (including those for residents of state MH/MR institutions) and for transportation of special education pupils.

(b) 1973-74 was the first year that Pittsburgh and Philadelphia Intermediate Units received special education funds. These two I.U.'s account for $52 million of the $72 million increase from 1972-73 to 1973-74: they were previously funded as school districts.

Source: PDE Bureau of Special and Compensatory Education

CHART Q

INTERMEDIATE UNIT AND SCHOOL DISTRICT EXPENDITURES-ALLOCATIONS OF STATE SUPPORT FOR SPECIAL EDUCATION(a) PER YEAR SINCE THE INCEPTION OF THE INTERMEDIATE UNIT

($ In Thousands)

Special Education Operating Unit	1971-72 (Expenditure)	1972-73 (Expenditure)	1973-74 (Allocation)	1974-75 (Allocation)	1975-76 (Allocation)
Intermediate Unit(6)	$ 44,319	$ 59,842	$ 132,202(b)	$ 148,733	$ 165,754
School Districts (6)	$ 20,300	$ 27,800	$ 17,814(b)	$ 19,088	$ 21,447(est.)
Total State Funds Provided to Public Schools	$ 64,619	$ 87,642	$ 150,016	$ 167,821	$ 187,201

(a) Includes state payments from the following appropriations to PDE: special education, pupil transportation (in part), and education at State MH/MR institutions.

(b) Philadelphia and Pittsburgh first received special payments as I.U.'s rather than school districts in FY 1973-74.

(6) It is important to note that I.U.'s receive advance state payments equal to the total cost per special pupil (including all instruction, overhead, and administrative costs)whereas school districts receive advance state payments equal only to "extra" special education costs; i.e., total costs minus overhead and minus an amount which represents average instruction costs for all students served directly by the districts (the vast majority of whom are regular students, of course). In the case of I.U. advance payments for special education, the Commonwealth "reimburses" itself in part in the following school year by withholding from subsidy payments to local school districts an amount equal to the calculated "tuition" charge per pupil served by that district. This tuition charge differs from "average instruction costs for all students" for a particular district in that the tuition charge includes overhead costs and a specified "rental" charge ($8 per elementary and $18 per high school pupil).

Source: Bureau of Special and Compensatory Education, PDE

Chart R on page 149 illustrates the distribution of state special education payments (for instruction and overhead, not including pupil transportation) during FY 1974-75 by individual I.U. as compared to the number of total special pupils served by each I.U. and as compared to the calculated fulltime equivalent (FTE) "average daily membership"[7] in special education classes of each of the intermediate units. As can be seen from the Chart, state payments per special education pupils vary widely among the I.U.'s, from a low of $331 per pupil (I.U. #22) to a high of $1,730 per pupil (I.U. #26); total state payments per special pupil served during FY 1974-75 amounted to $925. Using a different comparison index, i.e., state payments per special education student in fulltime equivalent average daily membership, the range of state payments per pupil goes from a low of $1,973 (I.U. #29) to a high of $4,342 per student (I.U. #11); total state payments per FTE-ADM were $2,663 in FY 1974-75.

2. Services to Nonpublic Schools

The state support shown on Chart N on page 144 of this report reflects the state allocations made to I.U.'s under the provisions of Acts 194 and 195 of 1972; more detailed information on funds received by I.U.'s in FY 1974-75 under these two Acts is set forth in Chart S on page 150. Acts 194 and 195 are, of course, no longer in effect, having been declared unconstitutional on May 19, 1975 (see page 21 of this report). State funds do continue during the current fiscal year to be available to I.U.'s, however, for services to nonpublic schools. Act 89, approved on August 1, 1975, charged I.U.'s with responsibility for delivering a program of auxiliary services to nonpublic school pupils within their area[8] and authorized the provision of state funds to cover the costs of delivery of these services.

These funds are to be appropriated annually and "allocated" by the Secretary of Education in July of each year to the respective intermediate units on the basis of the number of nonpublic school children who were attending school within the I.U.'s area as of October 1 of the previous school year. The maximum amount to be allocated to each I.U. was established at $45 per nonpublic pupil for the 1975-76 school year with a provision for this amount to be increased in subsequent years proportionate to increases which may occur in the per pupil reimbursement maximum set forth in the Basic Instruction Subsidy program for public schools.

The PDE is permitted under the law to retain 1% of the total statewide allocation to I.U.'s to cover its own costs in administering the program. The remainder of the funds are to be paid to I.U.'s in three installments during

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7/ This refers to a computed figure intended to translate total pupils served within different kinds of special education services to a comparable index and further to use this index in the reporting of the average number of pupils actually receiving instruction each day.

8/ Act 89 differs from Act 194 primarily in that these auxiliary services are to be provided in non-sectarian facilities; see page 60 of this report for further discussion.

CHART R

STATE PAYMENTS TO INTERMEDIATE UNITS FOR SPECIAL EDUCATION COMPARED TO SPECIAL STUDENT ENROLLMENTS, FY 1974-75

I.U. NAME & NUMBER		TOTAL PUPILS IN SPECIAL EDU. PROGRAM	FTE-ADM(a) IN SPECIAL EDU. PROGRAM	STATE PAYMENTS SPEC. EDU. (000's)	STATE PAYMENTS PER SPEC. EDU. PUPIL	STATE PAYMENTS PER SPEC. EDU. FTE-ADM(a)
I.U. No. 1	(1)	7,585	1,500	$ 4,299	$ 567	$ 2,866
Pittsburgh-Mt. Oliver	(2)	8,057	5,103	11,014	1,367	2,158
Allegheny	(3)	12,904	3,896	12,303	953	3,158
Midwestern	(4)	3,088	675	2,077	673	3,077
Northwest Tri-County	(5)	4,002	993	2,719	679	2,738
Clarion Manor	(6)	2,452	558	1,500	612	2,688
Westmoreland	(7)	6,020	1,658	4,225	702	2,548
Appalachia	(8)	6,144	2,867	5,964	971	2,081
Seneca Highlands	(9)	2,286	666	1,408	616	2,114
Central	(10)	2,661	865	2,151	808	2,487
Tuscarora	(11)	1,105	117	508	460	4,342
Lincoln	(12)	5,488	1,568	3,838	699	2,448
Lancaster-Lebanon	(13)	4,480	768	2,528	564	3,292
Berks County	(14)	3,043	1,183	2,933	964	2,479
Capital Area	(15)	5,205	1,202	4,306	827	3,582
Central Susquehanna	(16)	4,397	938	2,792	635	2,977
BLaST	(17)	2,503	844	2,337	934	2,769
Luzerne	(18)	3,218	1,141	3,042	945	2,667
Northeastern Educational	(19)	3,715	1,363	3,956	1,065	2,902
Colonial Northampton	(20)	3,517	1,110	2,858	813	2,575
Carbon-Lehigh	(21)	3,026	530	1,591	526	3,002
Bucks County	(22)	10,517	890	3,482	331	3,912
Montgomery County	(23)	5,212	1,250	4,984	956	3,987
Chester County	(24)	4,874	1,238	3,653	749	2,951
Delaware County	(25)	3,085	806	3,488	1,131	4,328
Philadelphia	(26)	23,030	16,360	39,832	1,730	2,435
Beaver Valley	(27)	3,699	788	2,039	551	2,588
ARIN	(28)	2,296	297	991	432	3,337
Schuylkill	(29)	1,873	752	1,484	792	1,973
Statewide Total		149,482	51,926	$ 138,302	$ 925	$ 2,663

NOTES: (1) Source of financial information was PDE Comptroller's Office; source of enrollment information, PDE Bureau of Special & Compensatory Education. (2) Enrollment figures include pupils served through itinerant programs and in state schools and hospitals as well as full-time I.U. community based programs; they do not include special students in school district operated classes. (3) Financial data includes all net payments to I.U.'s during the period July 1, 1974 to June 30, 1975 from the following appropriations: special education (General Fund); special education (Rev. Sharing Trust Fund) and State School and Hospitals-Education; in some cases, this includes payments applicable to other than FY 1974-75.

(a) Full Time Equivalent - Average Daily Membership (see footnote 7, page 148).

1974-75 NONPUBLIC SCHOOL SERVICES CHART S
(Acts 194 & 195) ALLOCATIONS* TO INTERMEDIATE UNITS

I. U.	Nonpublic Enrollment	Amt. for Act 195 Services	Act 195 Admin. Cost Allowance*	Amt. For Act 194 Services	Act 194 Admin. Cost Allowance*	Total for Nonpublic Services	Total Admin. Allowance*	Total Monies for Nonpublic
1	4,919	$ 118,056	$ 5,000	$ 169,810	$ 7,075	$ 287,866	$ 12,075	$ 299,941
2	27,206	652,944	27,206	961,472	40,061	1,614,416	67,267	1,681,683
3	32,939	790,536	32,939	1,130,292	47,095	1,920,828	80,034	2,000,862
4	4,012	96,288	5,000	161,309	6,721	257,597	11,721	269,318
5	13,093	314,232	13,093	465,595	19,400	779,827	32,493	812,320
6	2,461	59,064	5,000	86,544	5,000	145,608	10,000	155,608
7	8,334	200,016	8,334	305,412	12,726	505,428	21,060	526,488
8	10,757	258,168	10,757	367,238	15,302	625,406	26,059	651,465
9	3,180	76,320	5,000	109,212	5,000	185,532	10,000	195,532
10	993	23,832	5,000	37,759	5,000	61,591	10,000	71,591
11	362	8,688	5,000	30,623	5,000	39,311	10,000	49,311
12	6,296	151,104	6,296	233,275	9,720	384,339	16,016	400,395
13	6,491	155,784	6,491	374,340	15,597	530,124	22,088	552,212
14	5,061	121,464	5,061	209,378	8,724	330,842	13,785	344,627
15	7,270	174,480	7,270	303,978	12,666	478,458	19,936	498,394
16	3,948	94,752	5,000	153,628	6,401	248,380	11,401	259,781
17	1,559	37,416	5,000	58,583	5,000	95,999	10,000	105,999
18	12,562	301,488	12,562	430,192	17,925	731,680	30,487	762,167
19	8,302	199,248	8,302	305,139	12,714	504,387	21,016	525,403
20	7,990	191,760	7,990	275,369	11,474	467,129	19,464	486,593
21	7,090	170,160	7,090	243,926	10,164	414,086	17,254	431,840
22	20,289	486,936	20,289	706,961	29,457	1,193,897	49,746	1,243,643
23	37,471	899,304	37,471	1,348,716	56,196	2,248,020	93,667	2,341,687
24	7,794	187,056	7,794	388,479	12,020	475,535	19,814	495,349
25	40,410	969,840	40,410	1,381,046	57,544	2,350,886	97,954	2,448,840
26	130,102	3,122,448	130,102	4,490,029	187,085	7,612,477	317,187	7,929,664
27	2,906	69,744	5,000	99,209	5,000	168,953	10,000	178,953
28	1,184	28,416	5,000	51,619	5,000	80,035	10,000	90,035
29	5,937	142,488	5,937	203,335	8,472	345,823	14,409	360,232
TOTALS	420,918	$10,102,032	$445,394	$14,982,468	$639,539	$25,084,500	$1,084,933	$26,169,433

*Data on actual costs for 1974-75 were not available.

SOURCE: "Evaluation of the Administration and Implementation of Act 194 and Act 195 Through 1974-75", PDE, November, 1975 the school year (August, October and February); these I.U. allotments are to be used by the I.U.'s to cover their own Act 89 administrative costs (up to 6% of the total I.U. allotment), for rental of facilities[9] (up to 18% of the allotment) and for direct program costs (primarily professional salaries).

Chart T on page 152 sets forth total Act 89 allotments to each I.U. for the 1975-76 school year; in each case the total provided to the I.U. is equal to $45 times the indicated nonpublic school enrollment. (The PDE reported that it did not intend to retain the 1% administrative fee from the statewide Act 89 allocation during the current (1975-76) fiscal year.) As illustrated by Chart T, as much as $4.6 million (24%) of the total statewide Act 89 Allocation for FY 1975-76 may be used for I.U. administrative and facility leasing costs.

3. Intermediate Unit Subsidy

The third largest state grant program to the intermediate units (based on 1974-75 payments) is the "general operating" - "capital" subsidy[10] which is paid annually through PDE on the basis of formula provisions set forth in Sections 917A, 918A and 919A of the Public School Code.[11]. As specified in Section 917A of the Code, the PDE allocates "to each intermediate unit a portion of the amount included in the Governor's Budget for the succeeding fiscal year for the support of intermediate units." The allocation per I.U. is calculated using as factors the weighted average daily membership for all public schools within the I.U.'s area and a computed I.U. aid ratio. The law also stipulates that no individual I.U. may receive less in state operating subsidy than the amount of state and local funds (including local in kind contributions) expended during fiscal year 1968-69 for the county school offices that were replaced by the I.U. This latter stipulation is generally referred to as the "guarantee" clause.

Chart U on page 153 specifies per I.U. the amounts allocated in fiscal year 1975-76 by the PDE for general operating and capital subsidy; also, shown on the Chart are school districts' shares of each I.U.'s operating expenses and, thus, the grand total of all such projected costs (Column 7 of the table).

Of special note on Chart U is Column 4, entitled "Withholding from

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9/ This facility rental allowance has apparently been made because of the prohibition in Act 89 against use of sectarian nonpublic school facilities; some I.U.'s have leased mobile vans to be used for Act 89 service delivery, others have leased non-sectarian buildings near sectarian schools.

10/See page 6 of this report for further discussion of the subsidy formulas.

11/Not including activities in the areas of special education, nonpublic school services (Act 89), federally funded projects and others. Generally the activities to be partially paid under the state operating and capital subsidy are those specifically provided for in the I.U.'s "Program of Services" as approved by its board of directors. Both general operating and capital subsidy payments are made from the same appropriation, entitled I.U. Subsidy on Chart N page 144.

CHART T

NONPUBLIC SCHOOL SERVICES (ACT 89) ALLOTMENTS, FY 1975-76

I. U.	Non-public Enrollment	Allocation	6% Allowed For Administrative Cost	18% Allowed For Leasing Costs	76% Program Allowance
1	5,002	$ 225,090	$ 13,506	$ 40,516	$ 171,068
2	26,075	1,173,375	70,042	211,208	891,765
3	32,046	1,442,070	86,254	259,573	1,095,973
4	4,679	210,555	12,633	37,900	160,022
5	13,691	616,095	36,966	110,897	468,232
6	2,638	118,710	7,122	21,368	90,220
7	8,827	397,215	23,833	71,499	301,883
8	10,546	474,570	28,474	85,423	360,673
9	3,249	146,205	8,772	26,317	111,116
10	1,059	47,655	2,859	8,578	36,218
11	893	40,185	2,411	7,233	30,541
12	7,137	321,165	19,270	57,810	244,085
13	10,563	475,335	28,520	85,560	361,255
14	5,994	269,730	16,184	48,551	204,995
15	8,526	383,670	23,020	69,061	291,589
16	4,476	201,420	12,085	36,256	153,079
17	1,804	81,180	4,871	14,612	61,697
18	12,316	554,220	33,253	99,760	421,207
19	8,478	381,510	22,890	68,672	289,948
20	8,132	365,940	21,957	65,869	278,114
21	6,909	310,905	18,654	55,963	236,288
22	21,073	948,285	56,897	170,691	720,697
23	39,684	1,785,780	107,147	321,440	1,357,193
24	8,620	387,900	23,274	69,822	294,804
25	39,958	1,798,110	107,886	323,660	1,366,564
26	122,808	5,526,360	331,581	994,745	4,200,034
27	2,838	127,710	7,662	22,988	97,060
28	1,570	70,650	4,239	12,717	53,694
29	5,774	259,830	15,590	46,769	197,471
TOTALS	425,365	$ 19,141,425	$ 1,148,482	$ 3,445,458	$ 14,547,485

Source: Office of Nonpublic Schools, PDE

CHART U

INTERMEDIATE UNIT GENERAL OPERATIONS AND SERVICES INCOME BY SOURCE FOR THE 1975-76 SCHOOL YEAR

I.U.	Column 1 State General Operating Allocation	Column 2 State Capital Subsidy	Columns 3&(3A)(a) Total State Funds & % of Grand Total in ()	Column 4 Withholding From School District Subsidy	Column 5 Direct Payments by School Districts	Column 6 Total School Dist. Contribution (Cols. 4&5)	Column 7 Grand Total (Cols. 3&6)
01	$ 298,213	$ 18,349	$ 316,562(67%)	$ 153,233	$ -0-	$ 153,233	$ 469,795
02	84,277	1,167	85,444(100)	---	-0-	-0-	85,444
03	512,409	57,971	570,380 (42)	788,030	-0-	788,030	1,358,410
04	264,120	21,578	285,698 (59)	200,000	-0-	200,000	485,698
05	236,614	32,146	268,760 (60)	173,300	7,000	180,300	449,060
06*	208,414	11,787	220,201 (86)	35,000	-0-	35,000	255,201
07	273,096	16,350	289,445 (56)	231,000	-0-	231,000	520,446
08	325,135	10,748	335,883 (79)	91,000	-0-	91,000	426,883
09*	170,215	28,266	198,481 (68)	93,617	-0-	93,617	292,098
10*	153,536	10,919	164,455 (60)	---	110,210	110,210	274,665
11*	150,409	5,434	155,843(100)	---	-0-	-0-	155,843
12	248,191	9,151	257,342 (72)	100,000	-0-	100,000	357,342
13	223,017	19,511	242,528 (51)	236,640	-0-	236,640	479,168
14*	161,300	14,386	175,686 (45)	218,835	-0-	218,835	394,521
15	260,813	17,530	278,343 (68)	115,260	15,000**	130,260	408,602
16*	184,794	14,522	199,316 (20)	---	225,000*** 566,729	791,729	991,045
17*	191,155	5,877	197,032 (58)	144,728	-0-	144,728	341,760
18	198,594	22,408	221,002 (53)	193,216	-0-	193,216	414,218
19*	195,748	21,485	217,233 (41)	307,845	-0-	307,845	525,078
20*	125,894	3,919	129,813 (44)	162,783	-0-	162,783	292,596
21*	156,911	5,302	162,214 (54)	138,427	-0-	138,427	300,640
22*	312,145	24,902	337,047 (45)	380,374	35,000	415,374	752,422
23*	238,452	3,777	242,229 (18)	341,778	732,162	1,073,940	1,316,169
24*	155,122	12,565	167,687 (30)	382,335	-0-	382,335	550,022
25*	189,852	18,098	207,950 (36)	374,295	-0-	374,295	582,245
26	564,306	12,732	577,038 (97)	18,556	-0-	18,556	595,594
27	140,013	13,296	153,309 (61)	98,000	-0-	98,000	251,309
28*	154,101	5,505	159,606 (83)	33,694	-0-	33,694	193,300
29	94,154	3,014	97,168 (28)	252,500	-0-	252,500	349,668
TOTALS	$6,471,000	$ 442,695	$6,913,695 (50)	$5,264,446	$ 1,691,101	$6,955,547	$13,869,242

*These intermediate units receive the minimum guarantee as specified by Act 102--"... no intermediate unit shall be allocated less than the amount received during 1968-69 school year by the offices of county superintendents of schools replaced by the intermediate unit...".

** Received from school districts outside I.U. boundary for Instructional Materials Services.

*** Received from sources outside the I.U. boundary primarily for operation of the Governor's School for the Arts (see discussion on page 42).

(a) This column indicates the percentage of state support of general operations for all I.U.'s; i.e., column 3 as a percentage of column 7.

Source: PDE Bureau of Educational Administration and Management Support Services.

School District Subsidy." This column lists the approved[12] amount of money for intermediate unit general operations and services that PDE will withhold from school districts Basic Instruction Subsidy entitlements and pay directly to the appropriate intermediate unit. (Two intermediate units, Central (#10) and Central Susquehanna (#16), do not participate in this district withholding practice, but, rather, they bill their respective school districts directly (see column 5 of the Chart).

Tuscarora Intermediate Unit (#11) is the only intermediate unit (not including Pittsburgh and Philadelphia of course) that does not receive monies (FY 1975-76) from its member school districts for support of general operations. On the other hand, Montgomery County Intermediate Unit (#23) will receive about $1.1 million or 82% of its total revenue for general operations from local school districts. There are other examples of the wide variation among the individual I.U.'s in the percentage of state support for I.U. general operating costs shown in Column 3A on Chart U.

The ratio of state support to local support across all intermediate units for FY 1975-76 is about 50/50; this is displayed in Chart V on page 155. This Chart shows the amounts and percentages across all intermediate units of revenues received for general operations from state and local sources each year since the inception of intermediate units. In the first year of operation, 1971-72, state funding represented 74% of the intermediate units' general operating funds, it has dropped steadily since that time. Conversely, school district contributions have steadily increased from 26% in FY 1971-72 to 50% in FY 1975-76.

4. Pupil Transportation

A total of $11 million was paid to intermediate units during the FY 1974-75 for the costs of transporting children to and from I.U. operated education classes. Chart W on page 156 shows a breakdown of the payments for this purpose among the individual I.U.'s in comparison with special education enrollments. At least a part of the notable variance in the amounts of payments to individual I.U.'s is due to the different policies for transporting of special education pupils among the I.U.'s; that is, some I.U.'s operate their own school bus fleets, while others are dependent on the local school districts to transport pupils. For this and other data reasons, Chart W is not intended to serve as a source for the drawing of conclusions regarding "efficiency" of transportation costs among the I.U.'s.

It is important to note that $4.9 million of the $11 million in state payments to I.U.'s for transportation represented local district shares of such costs and were, in fact, "recovered" by the Commonwealth by withholding from state subsidies due the appropriate school districts.

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[12] "Approved" at the local level via the I.U. budget process and by PDE. See footnote 2 on page 5 of this report for description of local budgetary approval process.

CHART V

COMPARISON OF STATE AND LOCAL FUNDING FOR GENERAL OPERATIONS AND SERVICES OF INTERMEDIATE UNITS FROM 1971-72 THROUGH 1975-76 SCHOOL YEARS

	1971-72	%	1972-73	%	1973-74	%	1974-75	%	1975-76	%
General Operating Allocation	$5,976,343	71.7	$ 6,344,575	54.5	$ 5,874,953	52.6	$ 6,188,000	48.9	$6,471,000	46.6
Capital Subsidy	211,629	2.5	269,425	2.3	336,938	3.0	390,183	3.1	442,696	3.2
Total Commonwealth Funds	$6,186,972	74.3	$6,614,000	56.8	$6,211,891	55.6	$6,578,183	52.0	$6,913.696	49.8
Withholding From School District Subsidy	$1,463,018	17.6	$3,852,592	33.1	$4,447,199	39.8	$4,985,316	39.4	$5,264,445	38.0
Direct Payments by School District	682,611	8.2	1,183,078	10.1	512,276	4.6	1,088,467	8.6	1,691,101	12.2
Total School District Funds	$2,145,629	25.7	$5,035,670	43.2	$4,959,475	44.4	$6,073,783	48.0	$6,955,546	50.2
GRAND TOTAL	$8,332,601	100%	$11,649,670	100%	$11,171,456	100%	$12,651,966	100%	$13,869,242	100%

Source: PDE Bureau of Educational Administration and Management Support Services

CHA W

STATE PAYMENTS TO INTERMEDIATE UNITS FOR PUPIL TRANSPORTATION COMPARED TO SPECIAL EDUCATION ENROLLMENT FY 1974-75

I.U. NUMBER	SPECIAL ED. ENROLLMENT	STATE PAYMENTS TRANSP. (000's)	STATE PAYMENTS PER SPEC. ED. PUPIL
1	7,585	$ 491	$ 65
2	8,057	1,168	145
3	12,904	116	9
4	3,088	79	26
5	4,002	65	16
6	2,452	72	29
7	6,020	400	66
8	6,144	462	75
9	2,286	95	42
10	2,661	180	68
11	1,105	57	52
12	5,488	414	75
13	4,480	443	99
14	3,043	418	137
15	5,205	593	114
16	4,397	$ 99	$ 23
17	2,503	93	37
18	3,218	273	85
19	3,715	520	140
20	3,517	270	77
21	3,026	194	64
22	10,517	389	37
23	5,212	338	65
24	4,874	556	114
25	3,085	581	188
26	23,030	1,930	84
27	3,699	248	67
28	2,296	156	68
29	1,873	280	149
TOTAL	149,482	$ 10,980	$ 73

Source: PDE Comptroller's Office (financial data) and report prepared by PDE, Bureau of Special and Compensatory Education entitled "Special Education Programs and Services, 1974-75" (enrollment data).

Important: The Special Education enrollment data includes pupils served by the I.U.'s on both an itinerant and fulltime basis; also, the data represents all students, not just those who are transported by the I.U. Some I.U.'s (e.g. I.U. #3) make extensive use of school district transportation services.

Also: Financial data represent total payments made to the respective I.U.'s during the period July 1, 1974 to June 30, 1975 out of appropriations 01-16-37 (pupil transportation), including amounts applicable to local district share.

5. Education at State Schools and Hospitals

As a result of the agreement which settled the PARC suit against the Commonwealth (see page 22 of this report), intermediate units which have state institutions for the mentally retarded within their geographic area are responsible for operating education programs for residents of those institutions, either at the institution or within the local community. To finance these programs, the appropriate I.U.'s are allocated monies annually by the PDE Division of Special Education; Chart X on page 158 indicates the state payments so allocated in FY's 1974-75 and 1975-76 and the intermediate units and state institutions involved.

6. Education at State Correctional Institutions

The PDE assumed responsibility for operating the education programs at state prisons, youth development centers and youth forestry camps on July 1, 1974; PDE has carried out this responsibility (in part) through contractual arrangements with various intermediate units which are serving as operating agents for such education programs. (See page 35 of this report for further discussion of this matter.) The PDE, through its Office of Correction Education, provides monies annually to the appropriate I.U.'s to cover the costs of operation of these programs. Chart Y on page 159 sets forth the state allocations made to particular I.U.'s for such institutionally based programs during FY 1975-76; the Chart also sets forth, for the information of the reader, allocations of federal funds during FY 1975-76 to the I.U.'s for these particular programs.

CHART X

STATE PAYMENTS OR ALLOCATIONS FOR I.U. OPERATED EDUCATION PROGRAMS AT STATE INSTITUTIONS FOR THE MENTALLY RETARDED, FY 1974-75 & 75-76

(All Amounts in Thousands)

I.U. NAME AND NUMBER		STATE SCHOOL AND HOSPITAL	SPECIAL EDUCATION PAYMENTS FY 74-75	SPECIAL EDUCATION ALLOCATION FY 75-76	74 - 75 to 75-76 PERCENT INCREASE
I.U. No. 1	(#1)	Western SSH	$ 531.5	$ 913.5	72%
Clarion Manor I.U.	(#6)	Polk SSH	597.9	1,380.0	131%
Appalachia I.U.	(#8)	Cresson SSH	363.3	674.0	86%
		Ebensburg SSH	1,265.3	1,867.0	48%
Berks County I.U.	(#14)	Hamburg SSH	468.8	1,310.0	179%
Central Susquehanna I.U.	(#16)	Laurelton SSH	222.0	517.4	133%
		Selinsgrove SSH	397.5	1,040.9	162%
Luzerne I.U.	(#18)	White Haven SSH	351.6	763.0	117%
Chester County I.U.	(#24)	Pennhurst SSH	417.3	1,500.1	259%
TOTAL			$ 4,615.2	$ 9,965.9	116%

NOTES:

1. Source: Pa. Dept. of Education, Comptroller's Office and Division of Special Education.
2. SSH stands for State School and Hospital and denotes state owned institution for the mentally retarded.

CHART Y

STATE AND FEDERAL ALLOCATIONS TO INTERMEDIATE UNITS FOR EDUCATION PROGRAMS AT STATE CORRECTIONAL FACILITIES, FY 1975-76

($ Thousands)

I.U. NAME AND NUMBER	STATE CORRECTIONAL FACILITY	STATE FUNDS ALLOCATION	FEDERAL FUNDS ALLOCATION	TOTAL OF STATE AND FEDERAL FUNDS
Luzerne I.U. (#18)	Camp Hill SCI	$ 129.9	$ 318.3	$ 448.2
	Dallas SCI	189.8	189.3	379.1
	Greensburg SRCF	-0-	155.3	155.3
	Huntingdon SCI	32.1	83.0	115.1
	Muncy SCI	88.8	61.9	150.7
	Pittsburgh SCI	-0-	147.0	147.0
	Special Project	160.1	-	160.1
	(Sub Total I.U. #18)	($ 600.7)	($ 954.8)	($1,555.5)
Montgomery Co. I.U. (#23)	Graterford SCI	$ 171.5	$ 134.9	$ 306.4
Central I.U. (#10)	Rockview SCI	112.0	125.6	237.6
I.U. No. 1 (#1)	Waynesburg YDC	472.0	39.7	511.7
Allegheny I.U. (#3)	Warrendale YDC	-	46.8	46.8
Midwestern I.U. (#4)	New Castle YDC	781.3	-0-	781.3
Carbon-Lehigh I.U. (#21)	YFC #2(Hickory Run Park)	109.0	81.7	190.7
Bucks County (#22)	Cornwells Heights YDC	426.5	36.1	462.6
Beaver Valley I.U. (#27)	YFC #1(Racoon Creek Park)	113.8	58.8	172.6
GRAND TOTAL		$ 2,786.8	$ 1,478.4	$ 4,265.2

NOTES: (1) SCI and SRCF stand for State Correctional Institution, State Regional Correctional Facility, respectively and denote state owned facilities for adults. (2) YDC and YFC stand for Youth Development Center and Youth Forestry Camp, respectively and denote state owned facilities for juveniles. (3) Source of data: PDE Office of Correction Education.

V. MAJOR STUDY FINDINGS AND/OR CONCLUSIONS

1. Intermediate units have been required by state law and by direction of the State Board of Education and Department of Education to carry out certain functions in the areas of education of exceptional pupils (special education) and services to nonpublic school pupils. In addition, the I.U.'s are authorized under the Public School Code to offer a broad range of enumerated services and to conduct other activities, apparently without limitation.

2. Virtually all intermediate units[1] operate special education and nonpublic school service programs, offer curriculum development, educational planning, state and federal agency liaison and management services to their area school districts, and provide a continuing education program for area school district professional personnel.

Education of exceptional children (special education) is by far the most prominent activity of intermediate units. Virtually all I.U.'s deliver special education services for the entire range of pupil exceptionalities, whereas, the majority of school districts provide only special education services for the educable mentally retarded; generally, only the larger school districts provide a varied range of special education classes. As a result of recent rulings and resultant state directives, I.U.'s have been required to substantially expand their special education activities and expenditures, including assumption of educational services to residents of state institutions for the mentally retarded.

Aside from special education, instructional materials services is by far the most prominent service which is generally provided by the I.U.'s, received by local school districts and thought to be an important I.U. service by local school district officials.

3. Beyond the services common to nearly all I.U.'s (named in item #2 above), the I.U.'s vary considerably in their range of program offerings; in addition, the I.U.'s vary considerably from each other in the type of specific activities/projects through which they carry out the common services. To display this variation, the following is a list of programs/projects unique to one (or in some cases a few) I.U.'s and the page of this report on which the program/project has been described:

(a) Neighborhood Youth Corps (p.83)
(b) Pennscript (p. 81)

1/ In general the comments ascribed to intermediate units in this section of the report will relate to all I.U.'s except I.U. #26, Philadelphia, and I.U. #2 Pittsburgh; these two I.U.'s are separate and distinct in many ways from all other I.U.'s because of their congruent identity with the Philadelphia and Pittsburgh City School Districts.

(c) Comprehensive Guidance In-Service Center (p. 81)
(d) Project Sprout (p. 83)
(e) Governor's School for the Arts (p. 83)
(f) Special Education Student Information Network (p.89)
(g) Grand View Diploma Nursing Program (p. 86)
(h) Research and Information Services for Education (RISE) (p. 88)
(i) Youth Employment Program (p. 91)
(j) Close-Up Forum on the Involvement of Youth in Government (p. 93)
(k) Affective Education Center-Drug and Alcohol Education Services (p. 93)
(l) Spanish-English Second Language (p. 91)
(m) Career Opportunity Program (p. 70)
(n) Family Day Care (p. 65)

4. The large variation among I.U.'s in program offerings is at least partially a result of "encouragement" from the PDE to certain I U.'s to conduct certain functions. The following are examples of programs operated by certain I.U.'s at the invitation or request of the PDE (and the page of this report on which the programs are described):

(a) Right to Education (p. 84)
(b) SIRED (p. 84)
(c) Library Media Examination Centers (p. 85)
(d) Right to Read (p. 39)
(e) Arts in Education (p. 41)
(f) Special Education and the Arts (p. 41)
(g) State Correctional Institution Education (p. 35)
(h) Penna. Materials Center for the Visually Handicapped (p. 82)

5. The availability of federal funds for special "projects" has also been a substantial factor in the large variation in programs offered by the I.U.'s. Often, projects that are unique to only one or two I.U.'s are federally funded rather than financed with state and/or local monies.

6. While in most cases, the majority of I.U. effort is aimed at services within the legally designated (geographic) I.U. service area, some intermediate units are operating programs/projects for target recipients that are neither within nor even near the I.U.'s own geographic territory. Several I.U.'s have "branch offices" and/or fulltime employees located in Harrisburg and/or elsewhere outside of the I.U.'s territory. The following is a list of I.U. projects which provide a substantial portion of their services outside the geographic boundary of the operating I.U., generally including the entire Commonwealth. Included in parenthesis is the page number in the report on which the project is described.

(a) Special Education Resource Centers (p. 82)
(b) Library Media Examination Centers (p. 85)
(c) Science Leadership (p. 77)
(d) Special Education Math Project (p. 78)
(e) Guidance Counselor as a Curriculum Decision Maker (p. 78)
(f) Special Education and the Arts (p. 41)

(g) Arts in Education (p. 41)
(h) Pennsylvania Training Model (p. 80)
(i) Pennscript (p. 81)
(j) Comprehensive Guidance In-service Center (p. 81)
(k) Pennsylvania Materials Center for the
Visually Handicapped (p. 82)
(l) Right to Education (p. 84)
(m) Governor's School for the Arts (p. 83)
(n) National Learning Resource Center of Pa. (p. 87)
(o) Pennsylvania Accelerated School Success (p. 87)
(p) PRISE (p. 89)
(q) RISE (p. 88)
(r) Project 1776 (p. 91)

7. There are some activities being carried on by certain I.U.'s which do not appear to fit into any of the broad categories of services specifically authorized for I.U.'s by state law or regulation (for example, day care services, registered nurses' training, and job placement programs).

8. The wide range in activities of I.U.'s has contributed to an apparent lack of understanding among the public at large and even to some extent the education community regarding the basic purpose and scope of activities of the "intermediate unit" per se. In fact, there does not exist, at this point in time, a well defined, central description of the overall function and limitations on activities of the intermediate unit system.

9. The intermediate units generally perceive themselves as being primarily locally rather than "state" controlled; local school district officials, on the other hand, are almost evenly divided in their beliefs on this issue, with about half feeling that I.U.'s are primarily locally controlled and about half believing I.U.'s are primarily state controlled.

The intent of the General Assembly appears clearly to be that I.U.'s should retain some degree of local control while being responsive to overall state policies as expressed by the State Board of Education and PDE. The "intent" appeared to clearly exclude I.U.'s from ever serving primarily as regional offices of the state Department of Education.

Substantial concern exists currently among some I.U. and school district personnel that I.U.'s are being called upon by PDE to perform certain regional office types of functions; further, there is substantial evidence that to some degree the I.U.'s provide some regional office type services for the PDE. For example, the I.U.'s have certain "administrative" responsibilities under the direction of PDE for school district operated special education classes within their area, also, the PDE relies upon the I.U.'s to coordinate and/or conduct certain school construction project "field review" responsibilities assigned by law to the PDE, also, there is a general tendency among the staffs of several bureaus of the PDE to "request" I.U.'s to assist them in various functions such as (a) distribution of information to or collection of information from school districts, (b) "setting up" of conferences and meetings between PDE personnel and local school district personnel, and (c) interpretation of PDE "policies" and programs (e.g., educational quality assessment, long range planning) to school district personnel.

However, despite these "field office" type activities and despite other obvious influences which PDE exerts over I.U. operations, especially in the area of special education (which is fully state funded), the I.U.'s remain at this time generally independent of "state control" in their policies and activities. Some of the reasons for this maintenance of local control are (a) necessity for local school districts to financially support at least a portion of most intermediate unit budgets[2], (b) I.U.'s have the prerogative individually for personnel matters, including who they hire, employee salary schedules, personnel duties[3], etc. (c) the PDE has not made any centralized, concerted effort to bring I.U.'s under their total control as would be regional offices, per se, (d) some I.U. boards of directors have maintained their right to "respectfully" refuse to accept certain activities which PDE has requested them to carry out, and (e) the I.U. executive directors have organized themselves into an association called the Pennsylvania Association of Intermediate Units which enables them to discuss common matters and to relate to PDE as a group.

10. The majority of school district officials who expressed their opinion for this study indicated a generally positive attitude toward the intermediate units and their activities and programs, including a belief that the intermediate unit system is an improvement over the system of county school offices which it replaced; generally, I.U.'s are considered more service oriented.

11. With the possible exception of certain curriculum development services and special education activities, duplication of services among the I.U.'s, school districts and PDE does not appear to be a substantial current problem. However, the lack of a comprehensive definition of the full role of the intermediate unit system, including its specific expected functions in relation to local school districts and the PDE, contributes to continuing concern on the part of some I.U. and school district personnel about the "problem" of duplication.

12. In general, "problems" with the I.U. system expressed by various school officials who participated in this study are problems of a "local" or "individual" nature; there was no single "problem" with I.U.'s expressed generally, on a statewide basis, by school district officials. Examples of problems cited are as follows:

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[2] Even though only a relatively small portion (often less than 10%) of each I.U.'s total budget is subject to the formal I.U. budget approval process, this particular process appears to be an important factor in some cases in maintaining "local control" over I.U. operations.

[3] Intermediate units differ from each other in their personnel policies, salary schedules, administrative structures, etc. These matters are generally decided by each I.U.'s professional staff in conjunction (including collective negotiations of course) with its board of directors.

(a) Salaries of I.U. staff are too high;
(b) I.U. office is too far away (geographically) to be of substantial help;
(c) Not enough local school district control over I.U.; and
(d) State doesn't give I.U.'s enough money.

13. Neither the PDE, nor the I.U.'s as a group have developed a universal system of objective measurement that can be used to give an across-the-board indication of degree of effectiveness of special education or other I.U. operated programs.

14. The I.U.'s received and expended about $230 million in FY 1974-75; about 60% of this total amount came from state appropriations, about 20% to 25% from school districts, about 10% from the federal governemnt, and the remaining 5% to 10% came from interest income and other sources. The great bulk of all expenditures and of state support were in behalf of the special education program.

15. The state/local district shares of funds for basic I.U. operations (not including special education and other separately funded programs) has changed drastically from 74% state/26% local in FY 1971-72 to 50% state/50% local during the current fiscal year.

16. The intermediate unit staffs are very dissatisfied with the current I.U. funding process for basic I.U. operations. Almost universally, they desire enactment of a "mandated" state subsidy for I.U.'s similar to the one for school districts, which would "increase" state support annually and which would allow I.U.'s to know approximately what their state support will be for the coming school year for budget planning purposes.

VI. REPORT RECOMMENDATIONS

1. Current state laws pertaining to the intermediate unit system should be amended. The major thrust of such changes should be to more clearly and centrally define the comprehensive role to be played by the intermediate units within the public school system. Included within this role definition should be more clearly stated limitations (if any such limitations are desired by the General Assembly) on the types of programs and activities to be engaged in by intermediate units. Also, in development of this role definition, consideration should be given to whether or not intermediate units should provide services (in a substantial manner) to recipients which are located outside of their respective I.U. geographic areas. Consideration should also be given in the amending of the intermediate unit law to several issues of long term concern in relation to the intermediate units, such as (a) clarification of whether they can or cannot "own" motor vehicles and, if they can, under what circumstances, (b) possible provision of authority for the I.U.'s to "own" buildings themselves or development of a "simple" procedure to have I.U. buildings constructed and/or purchased in the name of member school district(s), (c) possible changing of the name of the intermediate unit system to a name more clearly identified with the public school system, (d) clarification of the authority of the PDE and State Board of Education to require intermediate units to perform specific activities which are not specifically designated in law as I.U. functions, and (e) clarification of the "special situation" of Philadelphia and Pittsburgh I.U.'s, with the possibility of exception of these two I.U.'s from certain "administrative and bookkeeping" requirements which are applicable to the other 27 I.U.'s but are, perhaps, unnecessary in the case of Philadelphia and Pittsburgh I.U.'s since they each consist of only one school district. (This is not to imply, of course, recommended elimination of Philadelphia and Pittsburgh from any basic I.U. responsibilities or funding mechanisms.)

2. If the current "intent" of the General Assembly is to insure maintenance of a degree of active local control over the intermediate units and to prevent possible drifting of the intermediate units toward service as regional offices of the Pennsylvania Department of Education, any changes that are made in the current funding system for intermediate units (for example, an amendment to improve the predictability of projected I.U. revenues from the state during their annual budget planning process) should provide for continued, substantial local school district financial contributions toward the cost of basic I.U. operations.

3. A uniform system of program objective(s) definition and related measure(s) of attainment should be developed by the PDE for application to intermediate unit programs. This system should relate I.U. program objective accomplishment(s) to expenditures (by source of funding). The system should be applied annually to all activities, including special education, and the information so obtained should be reported annually in aggregate, by program categories, by individual I.U., and in comparative I.U. forms for the use of appropriate committees of the General Assembly and the public at large.

APPENDIX A

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

INTERMEDIATE UNIT I

INCOME

Carryover from Previous Year		$ 887
Total Receipts		$ 6,424
State Payments	5,964	
Special Education	(3,768)	
Nonpublic Education	(303)	
I.U. Subsidy	(420)	
Pupil Transportation	(491)	
Other	(982)(b)	
Federal Payments	287	
Service User Fees	25	
Interest Income	145	
Other	3	
Total Available Funds		$ 7,311

OUTGO

Administration & Basic Services	$ 411
Nonpublic School Services	$ 297
Special Education	$ 3,882
Vocational-Technical Education	$ ---
Pupil Transportation	$ 456
Education in State MH/MR Institutions	$ 449
Education in State Correctional Institutions	$ 423
All Other (including Special Projects)	$ 316 (c)
Total Expenditures	$6,234
Year End Balance	$1,077

(a) All data obtained from respective intermediate units

(b) Includes $530,000 for State MR institution educational programs and $450,000 for education at state correctional institutions for youth

(c) Includes approximately $175,000 for Adult Education activities.

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

PITTSBURGH-MOUNT OLIVER INTERMEDIATE UNIT (#2)

INCOME

Carryover from Previous Year		$ 3,003
Total Receipts		$ 15,970
State Payments	15,290	
Special Education	(12,137)	
Nonpublic Education	(1,698)	
I.U. Subsidy	(72)	
Pupil Transportation	(1,168)	
Other	(215)	
Federal Payments	63	
Service User Fees	---	
Interest Income	574	
Other	43	
Total Available Funds		$ 18,973

OUTGO

Administration & Basic Services	$ 89
Nonpublic School Services	$ 1,292
Special Education	$ 11,477
Vocational-Technical Education	$ ---
Pupil Transportation	$ 892
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ 92
All Other (including Special Projects)	$ 33
Total Expenditures	$ 13,875 (b)
Year End Balance	$ 5,098 (b)

(a) All data obtained from respective intermediate units
(b) Expenditures reflect 11 month totals, June 1975 not reported

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

ALLEGHENY INTERMEDIATE UNIT (#3)

INCOME

Carryover from Previous Year		$ 2,123
Total Receipts		$ 21,174
State Payments	17,696	
Special Education	(12,303)	
Nonpublic Education	(2,303)	
I.U. Subsidy	(528)	
Pupil Transportation	(115)	
Other	(2,717) (b)	
Federal Payments	1,720	
Service User Fees	1,125	
Interest Income	513	
Other	120	
Total Available Funds		$ 23,297

OUTGO

Administration & Basic Services	$ 1,599
Nonpublic School Services	$ 2,039
Special Education	$ 12,705
Vocational-Technical Education	$ 1,612
Pupil Transportation	$ 155
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ 563
All Other (including Special Projects)	$ 3,246
Institutionalized children (county)	(1,025)
Early Childhood Dev. Center	(481)
Food Center	(293)
Western Pa. Reg. Resource Center	(264)
All other	(1,183)
Total Expenditures	$ 21,919
Year End Balance	$ 1,378

(a) All data obtained from respective intermediate units

(b) Includes $1.09 million of vocational education payments withheld the next year

FY 1974-75 REVENUE & EXPENDITURE DATA[a]
(Amts. in 000's)

MIDWESTERN INTERMEDIATE UNIT (#4)

INCOME		
Carryover from Previous Year		$ 434
Total Receipts		$ 5,264
State Payments	3,497	
Special Education	(2,077)	
Nonpublic Education	(248)	
I.U. Subsidy	(266)	
Pupil Transportation	(79)	
Other	(827)	
Federal Payments	1,563	
Service User Fees	59	
Interest Income	101	
Other	44	
Total Available Funds		$ 5,698

OUTGO	
Administration & Basic Services	$ 644
Nonpublic School Services	$ 248
Special Education	$ 2,079
Vocational-Technical Education	$ ---
Pupil Transportation	$ 66
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ 528
All Other (including Special Projects)	$ 1,576
ESEA Title I Projects	(826)
Vocational Educ. Fed. Projects	(570)
Other	(180)
Total Expenditures	$ 5,141
Year End Balance	$ 557

(a) All data obtained from respective intermediate units

FY 1974-75 REVENUE & EXPENDITURE DATA(a)

(Amts. in 000's)

NORTHWEST TRI-COUNTY
INTERMEDIATE UNIT (#5)

INCOME

Carryover from Previous Year		$ 427
Total Receipts		$ 5,484
State Payments	3,842	
Special Education	(2,719)	
Nonpublic Education	(793)	
I.U. Subsidy	(264)	
Pupil Transportation	(65)	
Other	(1)	
Federal Payments	1,269	
Service User Fees	253	
Interest Income	117	
Other	3	
Total Available Funds		$ 5,911

OUTGO

Administration & Basic Services	$ 1,815
Nonpublic School Services	$ 760
Special Education	$ 2,896
Vocational-Technical Education	$ ---
Pupil Transportation	$ 84
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ ---
Total Expenditures	$ 5,555
Year End Balance	$ 356

(a) All data obtained from respective intermediate units

FY 1974-75 REVENUE & EXPENDITURE DATA[(a)]

(Amts. in 000's)

WESTMORELAND INTERMEDIATE UNIT (#7)

INCOME

Carryover from Previous Year		$ 57
Total Receipts		$ 6,419
State Payments	5,842	
Special Education	(4,572)	
Nonpublic Education	(540)	
I.U. Subsidy	(251)	
Pupil Transportation	(455)	
Other	(24)	
Federal Payments	265	
Service User Fees	227	
Interest Income	75	
Other	10	
Total Available Funds		$ 6,476

OUTGO

Administration & Basic Services	$ 522
Nonpublic School Services	$ 483
Special Education	$ 4,367
Vocational-Technical Education	$ ---
Pupil Transportation	$ 455
Education in State MH/MR Institutions	$ 18
Education in State Correctional Institutions	$ 178
All Other (including Special Projects)	$ 61
Total Expenditures	$ 6,084
Year End Balance	$ 392

(a) All data obtained from respective intermediate units

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

APPALACHIA INTERMEDIATE UNIT (#8)

INCOME

Carryover from Previous Year		$ 628
Total Receipts		$ 8,289
State Payments	7,408	
Special Education	(4,336)	
Nonpublic Education	(662)	
I.U. Subsidy	(316)	
Pupil Transportation	(462)	
Other	(1,632) (b)	
Federal Payments	500	
Service User Fees	171	
Interest Income	181	
Other	29	
Total Available Funds		$ 8,917

OUTGO

Administration & Basic Services		$ 572
Nonpublic School Services		$ 934
Special Education		$ 3,883
Vocational-Technical Education		$ 13
Pupil Transportation		$ 506
Education in State MH/MR Institutions		$ 1,768
Education in State Correctional Institutions		$ ---
All Other (including Special Projects)		$ 219
Pre-School Activity (Title VI)	(35)	
Adult Education	(17)	
Refunded to State (Acts 194 & 195)	(41)	
Other	(126)	
Total Expenditures		$ 7,895
Year End Balance		$ 1,022

(a) All data obtained from respective intermediate units

(b) Includes $1.46 million for education at State MH/MR institutions

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

SENECA HIGHLANDS INTERMEDIATE UNIT (#9)

INCOME

Carryover from Previous Year		$ 46
Total Receipts		$ 2,818
State Payments	2,056	
Special Education	(1,587)	
Nonpublic Education	(196)	
I.U. Subsidy	(178)	
Pupil Transportation	(95)	
Other	(---)	
Federal Payments	595	
Service User Fees	126	
Interest Income	41	
Other	---	
Total Available Funds		$ 2,864

OUTGO

Administration & Basic Services	$ 300
Nonpublic School Services	$ 163
Special Education	$ 1,491
Vocational-Technical Education	$ 16
Pupil Transportation	$ 87
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ 597[b]
Total Expenditures	$ 2,654
Year End Balance	$ 210

(a) All data obtained from respective intermediate units.
(b) Includes $433,000 for "cooperative" ESEA Title I project.

FY 1974-75 REVENUE & EXPENDITURE DATA[(a)]

(Amts. in 000's)

CENTRAL INTERMEDIATE UNIT (#10)

INCOME

Carryover from Previous Year		$ 241
Total Receipts		$ 3,339
State Payments	2,882	
Special Education	(2,151)	
Nonpublic Education	(73)	
I.U. Subsidy	(164)	
Pupil Transportation	(179)	
Other	(315) (b)	
Federal Payments	282	
Service User Fees	96	
Interest Income	74	
Other	5	
Total Available Funds		$ 3,580

OUTGO

Administration & Basic Services		$ 242
Nonpublic School Services		$ 59
Special Education		$ 2,261
Vocational-Technical Education		$ ---
Pupil Transportation		$ 174
Education in State MH/MR Institutions		$ ---
Education in State Correctional Institutions		$ 101
All Other (including Special Projects)		$ 385
Pre-School Activity (Title VI)	(73)	
Work Experience & Training	(83)	
Reg. Res. Center of Penna	(155)	
Other	(74)	
Total Expenditures		$ 3,222
Year End Balance		$ 358

(a) All data obtained from respective intermediate units
(b) Includes $276,157 for education at State prison

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

TUSCARORA INTERMEDIATE UNIT (#11)

INCOME

Carryover from Previous Year		$ 162
Total Receipts		$ 1,088
State Payments	782	
Special Education	(508)	
Nonpublic Education	(62)	
I.U. Subsidy	(156)	
Pupil Transportation	(56)	
Other	(---)	
Federal Payments	255	
Service User Fees	18	
Interest Income	28	
Other	5	
Total Available Funds		$ 1,250

OUTGO

Administration & Basic Services	$ 223
Nonpublic School Services	$ 27
Special Education	$ 510
Vocational-Technical Education	$ ---
Pupil Transportation	$ 57
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ 98
All Other (including Special Projects)	$ 117[b]
Total Expenditures	$ 1,032
Year End Balance	$ 218

(a) All data obtained from respective intermediate units

(b) Includes several projects for education of inmates at Huntingdon State Correctional Institution

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

LINCOIN INTERMEDIATE UNIT (#12)

INCOME

Carryover from Previous Year		$ 1,089
Total Receipts		$ 5,754
State Payments	5,000	
Special Education	(3,838)	
Nonpublic Education	(407)	
I.U. Subsidy	(320)	
Pupil Transportation	(414)	
Other	(21)	
Federal Payments	577	
Service User Fees	---	
Interest Income	166	
Other	11	
Total Available Funds		$ 6,843

OUTGO

Administration & Basic Services	$ 312
Nonpublic School Services	$ 349
Special Education	$ 4,038
Vocational-Technical Education	$ ---
Pupil Transportation	$ 423
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ 595(b)
Total Expenditures	$ 5,717
Year End Balance	$ 1,126

(a) All data obtained from respective intermediate units.

(b) Includes Pre-School activities for handicapped, Adult Basic Education, Programs for children of migrant workers, activities at Camp Hill SCI, and others.

FY 1974-75 REVENUE & EXPENDITURE DATA[(a)]

(Amts. in 000's)

LANCASTER-LEBANON
INTERMEDIATE UNIT (#13)

INCOME		
Carryover from Previous Year		$ 78
Total Receipts		$ 4,852
State Payments	3,967	
Special Education	(2,528)	
Nonpublic Education	(559)	
I.U. Subsidy	(213)	
Pupil Transportation	(444)	
Other	(223)(b)	
Federal Payments	753	
Service User Fees	---	
Interest Income	121	
Other	11	
Total Available Funds		$ 4,930

OUTGO	
Administration & Basic Services	$ 479
Nonpublic School Services	$ 470
Special Education	$ 2,523
Vocational-Technical Education	$ ---
Pupil Transportation	$ 422
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ 753 (c)
Total Expenditures	$ 4,647
Year End Balance	$ 283

(a) All data obtained from respective intermediate units.
(b) Local district contributions.
(c) Includes $296,000 for ESEA Title VII (Bilingual Education) Program.

FY 1974-75 REVENUE & EXPENDITURE DATA(a)

(Amts. in 000's)

BERKS COUNTY

INTERMEDIATE UNIT (#14)

INCOME

Carryover from Previous Year		$ 14
Total Receipts		$ 10,007
State Payments	6,451	
Special Education	(3,089)	
Nonpublic Education	(295)	
I.U. Subsidy	(167)	
Pupil Transportation	(340)	
Other	(2,560)(b)	
Federal Payments	3,108 (c)	
Service User Fees	6	
Interest Income	---	
Other	442 (d)	
Total Available Funds		$ 10,021

OUTGO

Administration & Basic Services	$ 735
Nonpublic School Services	$ 340
Special Education	$ 2,900
Vocational-Technical Education	$ 1,894
Pupil Transportation	$ 328
Education in State MH/MR Institutions	$ 440
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ 2,889(e)
Total Expenditures	$ 9,526
Year End Balance	$ 495

(a) All data obtained from respective intermediate units.
(b) Includes $1.9 million vocational education payments and $469,000 for education at State MH/MR institution.
(c) Includes $258,000 in vocational education payments.
(d) Although listed by I.U. #14 as "Other Receipts", would appear to be largely "service user fees".
(e) Includes approximately $2 million for "Headstart" and "Early Childhood" Programs.

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

CAPITAL AREA INTERMEDIATE UNIT (#15)

INCOME

Carryover from Previous Year		$ 480
Total Receipts		$ 6,858
State Payments	5,665	
Special Education	(4,306)	
Nonpublic Education	(506)	
I.U. Subsidy	(260)	
Pupil Transportation	(593)	
Other	(---)	
Federal Payments	890	
Service User Fees	128	
Interest Income	166	
Other	9	
Total Available Funds		$ 7,338

OUTGO

Administration & Basic Services	$ 409
Nonpublic School Services	$ 403
Special Education	$ 4,452
Vocational-Technical Education	$ ---
Pupil Transportation	$ 571
Education in State MH/MR Institutions	$ 41
Education in State Correctional Institutions	$ 48
All Other (including Special Projects)	$ 854
Total Expenditures	$ 6,778
Year End Balance	$ 560

(a) All data obtained from respective intermediate units

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

CENTRAL SUSQUEHANNA

INTERMEDIATE UNIT (#16)

INCOME

Carryover from Previous Year		$ 550
Total Receipts		$ 6,161
State Payments	4,029	
Special Education	(2,228)	
Nonpublic Education	(270)	
I.U. Subsidy	(128)	
Pupil Transportation	(99)	
Other	(1,304)(b)	
Federal Payments	1,634	
Service User Fees	470	
Interest Income	28	
Other	---	
Total Available Funds		$ 6,711

OUTGO

Administration & Basic Services	$ 545
Nonpublic School Services	$ 243
Special Education	$ 1,923
Vocational-Technical Education	$ 103
Pupil Transportation	$ 87
Education in State MH/MR Institutions	$ 654
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ 2,607 (c)
Total Expenditures	$ 6,162
Year End Balance	$ 549

(a) All data obtained from respective intermediate units

(b) Includes $797,000 for education at State MR institutions, $263 for "Migrant Preschool" programs and other special grants.

(c) Includes about $880,000 for Neighborhood Youth Corps, $100,000 for Adult Basic Education, $205,000 for Gov.'s School for the Arts, $280,000 for programs for migrant workers' children, $103,000 for a Vocational Assessment Project, and expenses of several other projects.

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

BLaST INTERMEDIATE UNIT (#17)

INCOME

Carryover from Previous Year		$ 464
Total Receipts		$ 3,250 (b)
State Payments	2,832	
Special Education	(2,337)	
Nonpublic Education	(108)	
I.U. Subsidy	(292)	
Pupil Transportation	(93)	
Other	(2)	
Federal Payments	333	
Service User Fees	5	
Interest Income	74	
Other	6 (b)	
Total Available Funds		$ 3,714 (b)

OUTGO

Administration & Basic Services	$ 353
Nonpublic School Services	$ 94
Special Education	$ 2,298
Vocational-Technical Education	$ 395
Pupil Transportation	$ 89
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ (c)
All Other (including Special Projects)	$ 54
Total Expenditures	$ 3,283
Year End Balance	$ 431

(a) All data obtained from respective intermediate units
(b) Does not include $110,149 of unused funds returned to state and districts
(c) Less than $500

FY 1974-75 REVENUE & EXPENDITURE DATA(a)

(Amts. in 000's)

LUZERNE INTERMEDIATE UNIT (#18)

INCOME

Carryover from Previous Year		$ 130
Total Receipts		$ 4,802
State Payments	4,184	
Special Education	(2,691)	
Nonpublic Education	(677)	
I.U. Subsidy	(198)	
Pupil Transportation	(230)	
Other	(388)	
Federal Payments	314	
Service User Fees	230	
Interest Income	54	
Other	20	
Total Available Funds		$ 4,932

OUTGO

Administration & Basic Services	$ 470
Nonpublic School Services	$ 705
Special Education	$ 2,729
Vocational-Technical Education	$ ---
Pupil Transportation	$ 230
Education in State MH/MR Institutions	$ 516
Education in State Correctional Institutions	$ 129
All Other (including Special Projects)	$ 42
Total Expenditures	$ 4,821
Year End Balance	$ 111

(a) All data obtained from respective intermediate units

FY 1974-75 REVENUE & EXPENDITURE DATA[a]
(Amts. in 000's)
NORTHEASTERN EDUCATIONAL
INTERMEDIATE UNIT (#19)

INCOME

Carryover from Previous Year		$ (2)
Total Receipts		$ 9,694
State Payments	7,542	
Special Education	(4,319)	
Nonpublic Education	(535)	
I.U. Subsidy	(217)	
Pupil Transportation	(533)	
Other	(1,938)(b)	
Federal Payments	1,845	
Service User Fees	307	
Interest Income	---	
Other	---	
Total Available Funds		$ 9,692

OUTGO

Administration & Basic Services	$ 591
Nonpublic School Services	$ 550
Special Education	$ 4,141
Vocational-Technical Education	$ 2,241
Pupil Transportation	$ 550
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ 1,781
Day Care Program	(404)
ESEA Title I "Cooperative" Program	(403)
Career Opportunity Program	(169)
Other	(805)
Total Expenditures	$ 9,854
Year End Balance	$ (162)

(a) All data obtained from respective intermediate units
(b) Vocational Education payments

FY 1974-75 REVENUE & EXPENDITURE DATA[(a)]

(Amts. in 000's)

COLONIAL NORTHAMPTON
INTERMEDIATE UNIT (#20)

INCOME

Carryover from Previous Year		$ 620
Total Receipts		$ 4,075
State Payments	3,755	
Special Education	(2,857)	
Nonpublic Education	(498)	
I.U. Subsidy	(128)	
Pupil Transportation	(272)	
Other	(---)	
Federal Payments	84	
Service User Fees	101	
Interest Income	90	
Other	45	
Total Available Funds		$ 4,695

OUTGO

Administration & Basic Services	$ 254
Nonpublic School Services	$ 482
Special Education	$ 3,100
Vocational-Technical Education	$ ---
Pupil Transportation	$ 276
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ 80
Total Expenditures	$ 4,192
Year End Balance	$ 503

(a) All data obtained from respective intermediate units

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

CARBON-LEHIGH INTERMEDIATE UNIT (#21)

INCOME

Carryover from Previous Year		$ 344
Total Receipts		$ 3,023
State Payments	2,530	
Special Education	(1,634)	
Nonpublic Education	(431)	
I.U. Subsidy	(162)	
Pupil Transportation	(199)	
Other	(104)	
Federal Payments	330	
Service User Fees	102	
Interest Income	56	
Other	5	
Total Available Funds		$ 3,367

OUTGO

Administration & Basic Services	$ 271
Nonpublic School Services	$ 470
Special Education	$ 1,776
Vocational-Technical Education	$ ---
Pupil Transportation	$ 212
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ 149
All Other (including Special Projects)	$ 187
Total Expenditures	$ 3,065
Year End Balance	$ 302

(a) All data obtained from respective intermediate units

FY 1974-75 REVENUE & EXPENDITURE DATA(a)

(Amts. in 000's)

MONTGOMERY COUNTY INTERMEDIATE UNIT (#23)

INCOME

Carryover from Previous Year		$ 1,783
Total Receipts		$ 15,251
State Payments	10,970	
Special Education	(4,984)	
Nonpublic Education	(2,288)	
I.U. Subsidy	(244)	
Pupil Transportation	(338)	
Other	(3,116) (b)	
Federal Payments	2,808	
Service User Fees	770	
Interest Income	453	
Other	250	
Total Available Funds		$ 17,034

OUTGO

Administration & Basic Services	$ 2,286
Nonpublic School Services	$ 2,832
Special Education	$ 5,294
Vocational-Technical Education	$ 2,798
Pupil Transportation	$ 367
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ ---
Total Expenditures	$ 13,577
Year End Balance	$ 3,457

(a) All data obtained from respective intermediate units

(b) Vocational Education Payments

FY 1974-75 REVENUE & EXPENDITURE DATA(a)

(Amts. in 000's)

CHESTER COUNTY INTERMEDIATE UNIT (#24)

INCOME

Carryover from Previous Year		$ 432
Total Receipts		$ 6,705
State Payments	5,537	
Special Education	(3,236)	
Nonpublic Education	(503)	
I.U. Subsidy	(168)	
Pupil Transportation	(556)	
Other	(1,074) (b)	
Federal Payments	1,019	
Service User Fees	---	
Interest Income	149	
Other	---	
Total Available Funds		$ 7,137

OUTGO

Administration & Basic Services		$ 589
Nonpublic School Services		$ 477
Special Education		$ 3,278
Vocational-Technical Education		$ ---
Pupil Transportation		$ 504
Education in State MH/MR Institutions		$ 531
Education in State Correctional Institutions		$ 19
All Other (including Special Projects)		$ 1,056
Youth Employment Program	(610)	
Project 1776	(82)	
Vocational Edu. Projects	(119)	
Other	(245)	
Total Expenditures		$ 6,454
Year End Balance		$ 683

(a) All data obtained from respective intermediate units

(b) Includes $592,000 for Education at MH/MR Institution, $362,000 in school district payments, $75,000 for "Project 1776" and other.

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

DELAWARE COUNTY INTERMEDIATE UNIT (#25)

INCOME		
Carryover from Previous Year		$ 841
Total Receipts		$ 11,193
State Payments	9,797	
Special Education	(3,488)	
Nonpublic Education	(2,488)	
I.U. Subsidy	(208)	
Pupil Transportation	(581)	
Other	(3,032)(b)	
Federal Payments	261	
Service User Fees	691	
Interest Income	411	
Other	33	
Total Available Funds		$ 12,034

OUTGO	
Administration & Basic Services	$ 821
Nonpublic School Services	$ 2,218
Special Education	$ 3,689
Vocational-Technical Education	$ 3,091
Pupil Transportation	$ 545
Education in State MH/MR Institutions	$ 30
Education in State Correctional Institutions	$ 133
All Other (including Special Projects)	$ 500(c)
Total Expenditures	$ 11,027
Year End Balance	$ 1,007

(a) All data obtained from respective intermediate units

(b) Includes $2.9 million in vocational education payments

(c) Includes $386,000 "Return to State" and $113,000 for food service programs.

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

BEAVER VALLEY INTERMEDIATE UNIT (#27)

INCOME		
Carryover from Previous Year		$ 15
Total Receipts		$ 2,829
State Payments	2,799	
Special Education	(2,039)	
Nonpublic Education	(182)	
I.U. Subsidy	(141)	
Pupil Transportation	(248)	
Other	(189) (b)	
Federal Payments	15	
Service User Fees	---	
Interest Income	15	
Other	---	
Total Available Funds		$ 2,844

OUTGO	
Administration & Basic Services	$ 275
Nonpublic School Services	$ 155
Special Education	$ 1,913
Vocational-Technical Education	$ 31
Pupil Transportation	$ 250
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ 174
All Other (including Special Projects)	$ 31
Total Expenditures	$ 2,829
Year End Balance	$ 15

(a) All data obtained from respective intermediate units

(b) Includes $174,000 for education at state institution for delinquent youths.

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

ARIN INTERMEDIATE UNIT (#28)

INCOME

Carryover from Previous Year		$ 171
Total Receipts		$ 1,577
State Payments	1,417	
Special Education	(991)	
Nonpublic Education	(91)	
I.U. Subsidy	(160)	
Pupil Transportation	(156)	
Other	(19)	
Federal Payments	103	
Service User Fees	30	
Interest Income	25	
Other	2	
Total Available Funds		$ 1,748

OUTGO

Administration & Basic Services	$ 199
Nonpublic School Services	$ 93
Special Education	$ 975
Vocational-Technical Education	$ 12
Pupil Transportation	$ 158
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ 71
Total Expenditures	$ 1,508
Year End Balance	$ 240

(a) All data obtained from respective intermediate units

FY 1974-75 REVENUE & EXPENDITURE DATA[a]

(Amts. in 000's)

SCHUYLKILL INTERMEDIATE UNIT (#29)

INCOME		
Carryover from Previous Year		$ 155
Total Receipts		$ 4,192
State Payments	2,358	
Special Education	(1,484)	
Nonpublic Education	(366)	
I.U. Subsidy	(88)	
Pupil Transportation	(280)	
Other	(140) (b)	
Federal Payments	238	
Service User Fees	1,494	
Interest Income	78	
Other	24	
Total Available Funds		$ 4,347

OUTGO	
Administration & Basic Services	$ 361
Nonpublic School Services	$ 338
Special Education	$ 1,535
Vocational-Technical Education	$ 1,447
Pupil Transportation	$ 329
Education in State MH/MR Institutions	$ ---
Education in State Correctional Institutions	$ ---
All Other (including Special Projects)	$ 38 (c)
Total Expenditures	$ 4,048
Year End Balance	$ 299

(a) All data obtained from respective intermediate units

(b) Includes $81,000 in vocational education payments.

(c) Food Service Programs.

REPORT OF [I.U.] EXECUTIVE DIRECTORS

AND

THE PENNSYLVANIA DEPARTMENT OF EDUCATION

CONCERNING

REPORT ON THE PENNSYLVANIA INTERMEDIATE UNIT SYSTEM

REPORT OF EXECUTIVE DIRECTORS
AND
THE PENNSYLVANIA DEPARTMENT OF EDUCATION
CONCERNING
REPORT ON THE PENNSYLVANIA INTERMEDIATE UNIT SYSTEM

The report prepared for the Legislative Budget and Finance Committee appears to be objective in nature and should be of considerable value to legislators, school board members, intermediate unit personnel, district superintendents, members of the Pennsylvania Department of Education and all other groups and individuals who are interested in improving the services which intermediate units must provide for school districts.

The following statements concerning the report were developed by a committee of Intermediate Unit Executive Directors representing the Intermediate Unit Executive Directors' Association and by a representative of the Pennsylvania Department of Education appointed by the Secretary of Education:

1. Intermediate unit expenditures appear to have increased greatly during the past five years. These increases are due primarily to mandated increases in special education services and to legislation requiring services to nonpublic schools.

2. In most intermediate units the amount of money available from the state to provide the seven services listed in the law which established intermediate units, is only slightly larger than it was five years ago. This is due to the fact that the Commonwealth has not increased its subsidies to the extent necessary to meet rising costs and increased demands for services. We concur that legislation is necessary to increase systematically the subsidies to intermediate units.

3. The report indicates that in some instances school districts and intermediate units duplicate services. Intermediate units should not provide any service to a given district which the district can provide economically and effectively. Conversely, school districts should not provide services which can be provided more economically and effectively by intermediate units. If school districts and intermediate units implement this concept there will be less chance for a duplication of services.

4. The report shows a great diversity of programs between and among intermediate units. At the time the law which establishes intermediate units was passed, legislators discussed the possibility of this situation occurring. Some legislators wished to define specifically the duties of intermediate units. Other legislators believed the functions should be stated in general terms. The final decision was to state the functions in broad categories so that a diversity of programs could be developed to meet the unique needs of each geographical area. Experience has proven this to be a proper legislative decision.

5. The law does not permit intermediate units to own vehicles or buildings. This has increased operating costs in many intermediate units. A change in this aspect of the law should be seriously considered by the legislators.

6. The committee believes that intermediate units are and should remain under the control of local boards of education. Legislation requires that intermediate units provide special education programs and operate programs for non-public schools. Except for these two areas intermediate units are completely controlled by school directors acting within the provisions of the School Code.

The committee concurs with recommendations as contained in the report. The comments made by this committee are offered to emphasize certain comments which were made in the report and to offer their assistance to those individuals and groups who are asked to implement the recommendations.